

2

PART B HAZARDOUS WASTE PERMIT APPLICATION

for container storage facility at

Olin Water Services, Kansas City, Kansas

KSD000203638

Submission made to:

Kansas Department of Health and Environment

and

U. S. Environmental Protection Agency Region, VII

40 pages of text plus attachments

EPA-ARWM/PMTS

MAR 14 1983

Region VII K.C., MO

March 10, 1983

122.25(a)(1): A general description of the facility.

The facility will essentially be a reinforced concrete slab protected from run-on on three sides by a nine inch curb and on the fourth side by an asphalt access ramp which rises to nine inches. The interior of the facility will be sloped away from the access ramp to a trench drain and sump to provide drum leakage and run-off protection. See facility design drawings in Section 122.25(b)(1)(i).

122.25(a)(2): Chemical and physical analyses of the hazardous wastes to be handled at the facility....

As indicated in the waste analysis plan of Section 122.25(a)(3), the only kinds of hazardous waste generated at the plant are ignitable (D001), corrosive (D002), reactive (D003), EP toxic due to chromium (D007), and a limited number of commercial chemical product wastes identified in the RCRA regulations at 40 CFR 261.33 (f). While it is possible to anticipate the above categories of waste being placed into the proposed storage facility, it is not possible to anticipate precise chemical/physical analyses. The following are the analyses of the hazardous wastes currently in storage in the existing facility:

1. Sodium sulfite/sodium hydrosulfite waste.
 - a. Physical state: powder.
 - b. Constituents and percent by weight:
 1. Sodium sulfite (approx. 50%).
 2. Sodium hydrosulfite (approx. 50%).
 - c. Reactivity data: May react with water, steam, or acids to produce a corrosive and toxic material; will emit highly toxic fumes of SO₂ when heated to fire conditions; a strong reducing agent; incompatible with oxidizing agents.
 - d. RCRA Hazardous Waste I.D. Nos.: D001, D003.
2. Ether/formamide/bisthiocyanate waste.
 - a. Physical state: liquid.
 - b. Constituents and percent by weight:
 1. Methylenebisthiocyanate (approx. 10%).
 2. Dimethyl formamide (approx. 25%).
 3. Diethylene glycol monoethyl ether (approx. 50%).
 4. Diethylene glycol monobutyl ether (approx. 15%).
 - c. Reactivity data: Contact with strong acid/alkali may produce cyanide; waste may emit cyanide fumes when heated to decomposition; incompatible with oxidizing agents; co-polymerization may occur.
 - d. RCRA Hazardous Waste I.D. Nos.: D001, D003.
3. Polyphosphoric acid waste.
 - a. Physical state: liquid.
 - b. Constituents and percent by weight:
 1. Polyphosphoric acid/isopropyl phosphate (50%-55%).
 2. Isopropyl alcohol (45% - 50%).
 3. Chromic acid (0% - 0.2%).

- c. Reactivity data: Waste is incompatible with oxidizing agents and alkalies; polyphosphoric acid decomposes when heated to fire conditions to produce highly toxic POx fumes; waste is readily ignitable due to its isopropyl alcohol content.
 - d. RCRA Hazardous Waste I.D. Nos.: D001, D002, D007.
4. Phosphonic acid waste.
- a. Physical state: liquid.
 - b. Constituents and percent by weight:
 - 1. Aminotris (methylphosphonic acid) (approx. 50%).
 - 2. Water (approx. 50%).
 - c. Reactivity data: Waste is incompatible with alkalies.
 - d. RCRA Hazardous Waste I.D. No.: D002.
5. Sodium dichromate, zinc sulfate, sodium lignosulfonate waste.
- a. Physical state: powder.
 - b. Constituents and percent by weight:
 - 1. Sodium dichromate, dihydrate (approx. 65%).
 - 2. Sodium lignosulfonate (approx. 20%).
 - 3. Zinc sulfate monohydrate (approx. 15%).
 - c. Reactivity data: Waste is incompatible with combustible materials and reducing agents, especially in acidic solution; waste should not be exposed to high temperatures and drums of the waste should not be exposed to direct sunlight; waste is incompatible with strong acids; waste should be protected from exposure to water, mists, steam; SOx fumes can be emitted under fire conditions.
 - d. RCRA Hazardous Waste I.D. Nos.: D001, D003, D007.
6. Sodium dichromate, sodium tri-polyphosphate, sodium lignosulfonate waste.
- a. Physical state: powder.
 - b. Constituents and percent by weight:
 - 1. Sodium dichromate, dihydrate (approx. 60%).
 - 2. Sodium tri-polyphosphate (approx. 20%).
 - 3. Sodium lignosulfonate (approx. 20%).

- c. Reactivity data: Same as for sodium dichromate, zinc sulfate, sodium lignosulfonate waste, described immediately above, except that POx fumes can also be emitted under fire conditions.
- d. RCRA Hazardous Waste I.D. Nos.: D001, D003, D007.

122.25 (a) (3): A copy of the waste analysis plan
required by Section 264.13 (b)....

I. Parameters for which analysis will be conducted:

- Constituents
- Flashpoint
- pH
- Corrosion rate
- EP toxicity contaminants
- Visual appearance
- Specific gravity
- Odor
- Water solubility

II. Rationale for selection of parameters:

- The only kinds of hazardous waste generated at the plant are ignitable waste (D001), corrosive waste (D002), reactive waste (D003), EP toxic waste due to chromium (D007), and a limited number of commercial chemical product wastes identified in the RCRA regulations at 40 CFR 261.33 (f).
- Wastes that are ignitable can be identified as such either from their flashpoint or a knowledge of their constituents.
- Wastes that are corrosive can be identified as such either from their pH, in the case of aqueous liquid wastes, from their corrosion rate, or from a knowledge of their constituents.
- Wastes that are reactive can be identified as such from a knowledge of their constituents. In most cases, the only reactive hazardous wastes would be solid powder wastes containing sodium hydrosulfite or a combination of sodium dichromate and sodium lignosulfonate.
- Wastes that are commercial chemical product wastes listed in 40 CFR 261.33 (f) are identifiable as such from a knowledge of their generation at the plant.

III. Test methods:

- (a) If the material is product that is out of specifications, normally because of age, only the parameters tested for quality control are checked. These procedures are to be found in the Quality Control Analytical Procedures manual. A copy of the contents of this manual by test name is attached.
- (b) If a sample of unknown is brought into the laboratory, the plant should supply such information as is available. The source, etc., may be helpful in determining the composition. The general laboratory test procedures are as follows:
 - (1) Visual observation.
 - (2) Physical/chemical properties measurements. Thus would include specific gravity, pH, color, odor, and water solubility. pH would be measured with a Beckman Expandomatic SS-2 and a Fisher combination electrode.
 - (3) Metals screening. This would be checked by photoanalysis by argon plasma, a unit from Spectrametrics, Inc. III. If mercury or selenium are indicated by the metals screening, it will be necessary to send the sample to an outside lab. Quantitative determination of other metals would be determined by the argon plasma or atomic absorption spectroscopy.
 - (4) Organic. An infra red spectrometer (Perkin Elmer 597) or gas chromatograph (Varian 3700) would be used for organic identification. Tannin and lignin would be tested by the Hach colorimetric Tyrosine Method.
 - (5) Corrosion rate would be determined by test method NACE Standard TM 01-69 as specified by DOT Regulations 49CFR 173.240 (F) paragraph A.
 - (6) Flashpoint, if appropriate, would be determined by the Pensky Martin Method, ASTM D93-IP34.
 - (7) EP toxicity contamination, as appropriate. This would include chromium by AAS EPA, 1979 Method 218.1.

IV. Sampling methods:

The plant will do the sampling. Powdered materials and unknown liquids will be sampled with a sample thief, such as used for grain sampling, purchased from the Seedburo Equipment Co., Chicago, IL. This is a brass tube which when the knob on the top is turned counter clockwise is closed. When the knob is turned clockwise, gaps are opened on the side of the tube so that the material is sampled at all levels. The closed thief should be inserted to the bottom of the drum, opened, rotated to fill, closed, and withdrawn.

Liquid products that are out of specification may be sampled with a pump that draws from at least half way into the drum. The sample thief or the pump must be clean and dry when using.

Before testing in the laboratory, liquid samples will be well mixed. Powders will be ground in a Spex mill to break up lumps and run repeatedly through the sample splitter until the amount remaining in the pans is close to the amount to be weighed for analytical testing.

If the solid is caked, it may not be possible to use the sample thief. A few pieces will be taken from various locations to make the sample as representative as possible. This is acceptable because the waste materials we encounter usually are products or raw materials whose possible contamination is known to us.

V. Waste analysis recordkeeping:

The information at the top of the Waste Disposal Record Sheet will be filled in by the plant and brought to the laboratory with the sample. The information for Sections I and V will be filled in by the laboratory as far as applicable for the sample.

This will be copied and filed in the laboratory. The form will then be returned to the plant for completion. A copy of the completed form will be retained in the plant office. Enclosed is a copy of a blank Waste Disposal Record Sheet.

QUALITY CONTROL TESTS - SORTED BY QC TEST NAME

| QCCode | QC Test Name | Method | Range/Detection Limit |
|--------|--------------------------|--------------|-----------------------------------|
| 600B1 | Acidity | Titration | 2 mg/1 CaCO ₃ |
| 100C3 | Alkalinity, P & T | Titration | 2 mg/1 CaCO ₃ |
| 101B1 | Aluminum | AAS | 2-25 mg/1 Al |
| 185A7 | AMP/NaOH/NH ₃ | Titration | 0.5-75% AMP |
| 225B1 | BN | Drop | 1% BN |
| 200A3 | Boron | Spectrometer | 0-15 mg/1 B |
| 300A4 | Bromocide | Spectrometer | - |
| 300A2 | Bromocide TM | Titration | - |
| 320A4 | BTC 1100 | Spectrometer | 5-25% Active |
| 235B3 | Calcium | AAS | 0.1-5.0 mg/1 Ca |
| 185A8 | CHA | Spectrometer | 0.25-10 mg/1 CHA |
| 185B3 | CHA/DEEA | Titration | 0.2-50% CHA/DEEA |
| 150B4 | Chelant, Total | Titration | 0.5-50% Na ₄ EDTA |
| 300B1 | Chlorine, Available | Titration | - |
| 320B3 | Chloride-WSCP | Titration | 0.025% Cl |
| 205B1 | Chromium | AAS | 0.1-5 mg/1 Cr |
| 180B1 | Cobalt | AAS | 0.1-5 mg/1 Co |
| 330B1 | Copper | AAS | 0.1-5.0 mg/1 Cu |
| 300A3 | DBNPA | Titration | 2-5% DBNPA |
| 330A3 | DTC | Spectrometer | 0-10 mg/1 DTC |
| 235B2 | Iron | AAS | 0.1-5.0 mg/1 Fe |
| 699B2 | Magnesium | AAS | 0.02-0.40 mg/1 Mg |
| 605A1 | Manganese | AAS | 0.02-2.0 mg/1 Mn |
| 699B1 | Manganese, Organic | AAS | 0-2.5 mg/1 Mn |
| 330A4 | MBT | HPLC | 5-15% (w/v) MBT |
| 200B1 | Mempo | Solubility | - |
| 203B1 | Molybdenum | Spectrometer | 1-25 mg/1 Mo |
| 185A9 | Morpholine | Spectrometer | 0-6 mg/1 Morpholine |
| 185B5 | Morpholine | Titration | 0.5-100% Morpholine |
| 310B1 | NaPCP | Spectrometer | 2-6 mg/1 NaPCP |
| 280C1 | Nitrite | Titration | 10 mg/1 NO ₂ |
| 185B4 | ODA | Spectrometer | 0-1.5 mg/1 ODA |
| 100A8 | pH | pH Meter | 0.5-13.5 pH Units |
| 605A2 | Phosphate | Spectrometer | 0.05-2 mg/1 Ortho PO ₄ |

| | | | |
|-------|------------------------|--------------|---------------------------------|
| 100B2 | Phosphate | Spectrometer | 1-20 mg/1 Ortho PO ₄ |
| 160C2 | Poly | Spectrometer | 20-100 mg/1 PA Acid |
| 320B1 | Quat | Titration | 5-25% Quat Salt |
| 110A1 | Silica | Spectrometer | 0-15 mg/1 SiO ₂ |
| 100B7 | Specific Gravity/Baume | Hydrometer | - |
| 235B1 | Sulfate | Spectrometer | 5-150 mg/1 SO ₄ |
| 100B6 | Sulfite | Titration | 0.5-100% SO ₃ |
| 110A3 | Tannin & Lignin | Spectrometer | 0-40 mg/1 Tannin |
| 180A3 | THQ | Spectrometer | 5-35 mg/1 THQ |
| 320B2 | Tin | AAS | 2-50 mg/1 Sn |
| 201A1 | Triazoles | Spectrometer | 0-10 mg/1 TT or BZT |
| 186A1 | Viscosity | Viscometer | 5-800,000 cps |
| 320A5 | WSCP-2 | Spectrometer | 30-100 mg/1 Active |
| 200B2 | Zinc | AAS | 0.02-1.0 mg/1 Zn |

WASTE DISPOSAL RECORD SHEET

No. _____

Date _____

Material _____ Batch Number _____

Quantity: Drums _____ 55 _____ 30 _____ Bags _____ Bulk _____ Other _____

Combined Weight of Material _____

Rework summary, describe unsuccessful efforts to recover material:

I. Material Analysis

Properties

A. Waste

Constituents

%

| | |
|-------|-------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

Physical Form _____

Flashpoint _____ °F

pH _____

Corrosion Rate _____ MPY

EP Toxicity Contaminants:

Chromium _____ PPM

Other _____ PPM

Other Contaminants:

Copper _____ PPM

Zinc _____ PPM

Surfactants _____ PPM

Other _____

II. Classification of Waste

Hazardous ☐Non-Hazardous ☐Corrosive ☐Ignitable ☐Toxic ☐Other ☐

WASTE DISPOSAL RECORD SHEET

No. _____

Page 2

III. Assigned To Waste Storage Area

Date Packaged _____ Container Spec _____

Date Labelled and Marked _____

Hazardous Waste Label ☐ Non-Hazardous Waste Label ☐

D.O.T. Hazardous Material Label _____

Stencilled Shipping Name _____

Date Transferred to Storage Area _____

IV. Hazardous Waste Disposal

Disposal Contractor _____

Waste Transporter _____

Date Shipped _____ Manifest: Number _____ Date _____

V. Non-Hazardous Liquid Waste Analysis

| <u>Parameter</u> | <u>Sewer Limit</u> | <u>Waste</u> | <u>Treated/Diluted Waste</u> |
|--------------------|------------------------|--------------|----------------------------------|
| Suspended Solids | 500 mg/l max. | _____ | _____ |
| BOD | 500 mg/l max. | _____ | _____ |
| COD | 750 mg/l max. | _____ | _____ |
| pH | 5.5 to 9.5 | _____ | _____ |
| Flashpoint | None | _____ | _____ |
| Chromium as Cr | 3 mg/l max. | _____ | _____ |
| Copper as Cu | 1 mg/l max. | _____ | _____ |
| Zinc as Zn | 5 mg/l max. | _____ | _____ |
| Surfactants | 100 mg/l | _____ | _____ |
| Other Heavy Metals | _____ | _____ | _____ |

WASTE DISPOSAL RECORD SHEET

No. _____

Page 3

VI. Disposal Plan - Non-Hazardous Waste

A. Solids

1. Basis: _____

2. Contractor _____
Notification Date _____ Contractor Approval Date _____
Comments: _____

3. Disposal Plan/Procedure _____

B. Liquids

1. Basis: _____

2. Disposal Plan/Procedure _____

VII. Approvals/Certification

Disposal Plan Approvals

Plant Manager _____

Production Manager _____

Certification

Waste described herein disposed of in accordance with above
approved plan.

Disposal Supervisor _____

Date of Disposal _____

122.25(a)(4): A Description of the Security
Procedures and equipment required by section 264.14

The waste storage facility is located in the southwest corner of the production yard which is on the south side of the production building (see Plot Plan in Section 122.25(b)(1)(i)). The production yard is bounded by the production building on its north side and by a seven foot high chain link fence topped by three strands of barbed wire on its other sides. At the end of each working day the production building is locked up and the two active gates on the east and west sides of the production yard are chained and padlocked. There are two other gates to the production yard which are permanently locked shut.

Warning signs are posted on the north and east sides of the hazardous waste storage facility so as to be clearly legible at any position within no less than 25 feet of the facility in the production yard. These signs read, "Danger - Unauthorized Personnel Keep Out."

Additional security is provided by a private security patrol which makes nightly patrols of the plant site area.

122.25(a)(5): A copy of the general inspection schedule required by Section 264.15(b)....

GENERAL INSPECTION SCHEDULE

I. Procedures and Responsibilities

- A. General inspection frequency: weekly
- B. Individuals authorized to conduct inspection in order of alternate service:
 - 1. Production supervisor.
 - 2. Warehouse supervisor.
 - 3. Plant manager.

II. Items to be inspected and frequency of inspections.

- A. Condition of containers (weekly).
 - 1. Leaks.
 - 2. Deterioration.
 - 3. Stability of stacking arrangements and condition of pallets.
- B. Condition of containment system (weekly).
- C. Amount of aisle space between containers (weekly).
- D. Condition of emergency equipment (monthly).
 - 1. Fire hoses and fire extinguishers.
 - 2. Siren alarms.
 - 3. Emergency showers and eye wash stations.
 - 4. Scott Air Packs.
 - 5. Liquid vacuum equipment.

III. Items inspected by outside contractors/suppliers and frequency of inspections.

- A. Fire hoses and fire extinguishers (yearly).
- B. Sprinkler system (monthly).

IV. Inspection log

- A. Information to be included in the inspection record should include date, time of inspection, name of inspector, a notation of observations made, date and nature of any repairs or other remedial actions.
- B. This record will be maintained in the Production Supervisor's office and kept for a minimum of three years from the date of the inspection.

V. Handling of deteriorated, damaged, or leaking containers.

- A. In the event that a drum is noted during an inspection, or any other time, to be in a deteriorated condition such as to pose a possible health or environmental hazard, the drum is to be moved out of the storage area, the contents are to be repackaged in a suitable container, and the new drum is to be placed in the waste storage area.
- B. Spills or leaking containers are to be handled in accordance with the Spill Control Procedure.

SECTION NOT APPLICABLE

122.25(a)(7): A copy of the contingency plan....

See attached Hazardous Waste Management Contingency Plan for Olin Water Services-Kansas City Plant.

Hazardous Waste Management
Contingency Plan for Olin Water Services
Kansas City Plant

I. Emergency coordinators (in order that they are to assume responsibility as alternates):

A. Larry Prouty

1. Telephone Nos.:

a. Office: 621-6410

b. Home : [REDACTED] Ex. 6 PII

2. Home Address:

[REDACTED] Ex. 6 PII

B. Glen Jenkins

1. Telephone Nos:

a. Office: 621-6440

b. Home : [REDACTED] Ex. 6 PII

2. Home Address:

[REDACTED] Ex. 6 PII

C. William Dame

1. Telephone Nos.:

a. Office: 621-6460

b. Home : [REDACTED] Ex. 6 PII

2. Home Address:

[REDACTED] Ex. 6 PII

II. Arrangements with fire department, ambulance service, hospitals, etc.

A. Fire Department:

The local Kansas City, Kansas Fire Department was contacted by EPA, Region VII by letter dated May 26, 1981 (attached) concerning RCRA contingency plan submission and evaluation. Pursuant to that letter, Fire Inspector Gary Boyert visited the Olin Water Services plant and a number of other facilities in the area which had filed RCRA Part A permit applications. His interest in not being sent a RCRA contingency plan is documented in the attached memorandum dated July 22, 1981. Nevertheless, the Fire Department's local station which is two blocks away from the plant can be contacted in the event of a fire by activating a fire box switch (see diagram of 3155 Fiberglass Road Building) or by calling 371-2121.

B. Ambulance Service:

An ambulance service known as KARE which functions in conjunction with the Kansas City, Kansas Fire Department is automatically dispatched whenever the fire department is contacted at 371-2121 and injuries reported.

C. Hospitals:

Arrangements have been made for immediate delivery of medical services to Olin Water Services personnel taken to either of the following medical care centers:

- 1) Bethany Hospital
51 N. 12th Street
Kansas City, Kansas
- 2) Fairfax Industrial Clinic
103 Fairfax Terminal Building
3101 Fairfax Road
Kansas City, Kansas

The KARE Unit referred to above will take injured personnel to Bethany Hospital. Less serious injuries for which ambulance transportation is not necessary can be treated at either the Fairfax Industrial Clinic or Bethany Hospital. The Fairfax Industrial Clinic is equipped to handle most emergencies and should be used whenever possible; prior to going to the Fairfax Industrial Clinic contact should be made with Dr. Robert W. Wright or, in his absence, the doctor assuming his responsibilities at 321-2420.

D. Police Department:

Because of the limited size of the plant's hazardous waste storage facility and the limited scale of hazardous waste management operations at the plant, no meaningful purpose would be served by making special contingency arrangements with the Police Department.

III. Emergency Equipment

- A. Four fire hoses at strategic locations with 110 pounds line pressure (see diagram of 3155 Fiberglass Road Building).
- B. (42) 10 pound class ABC hand fire extinguishers (see diagrams of both buildings).
- C. Two siren alarms with five activating switches (see diagram of 3155 Fiberglass Road Building).
- D. Numerous telephones in both buildings.
- E. A.D.T. monitored sprinkler system in both buildings.
- F. Ten emergency showers and eye wash stations (see diagrams of both buildings).
- G. First aid kits, stretcher and emergency oxygen (see diagrams of both buildings).
- H. Two Scott Air Packs with self contained breathing air (one for each foreman's office).
- I. Two AMBU resuscitators for manual mouth resuscitation (one in each foreman's office).
- J. Two pieces of liquid vacuum equipment each with 55 gallon capacity (one in each building).
- K. Four dozen MSA respirators with all appropriate NIOSH approved cartridges in the 305 Sunshine Road supply room.
- L. Neoprene knee high boots, MSA neoprene rain suits, gloves, goggles, safety glasses, etc. in the 305 Sunshine Road supply room.
- M. 1000 pounds of Dri-Sorb and vermiculite stored in both buildings.

IV. Evacuation:

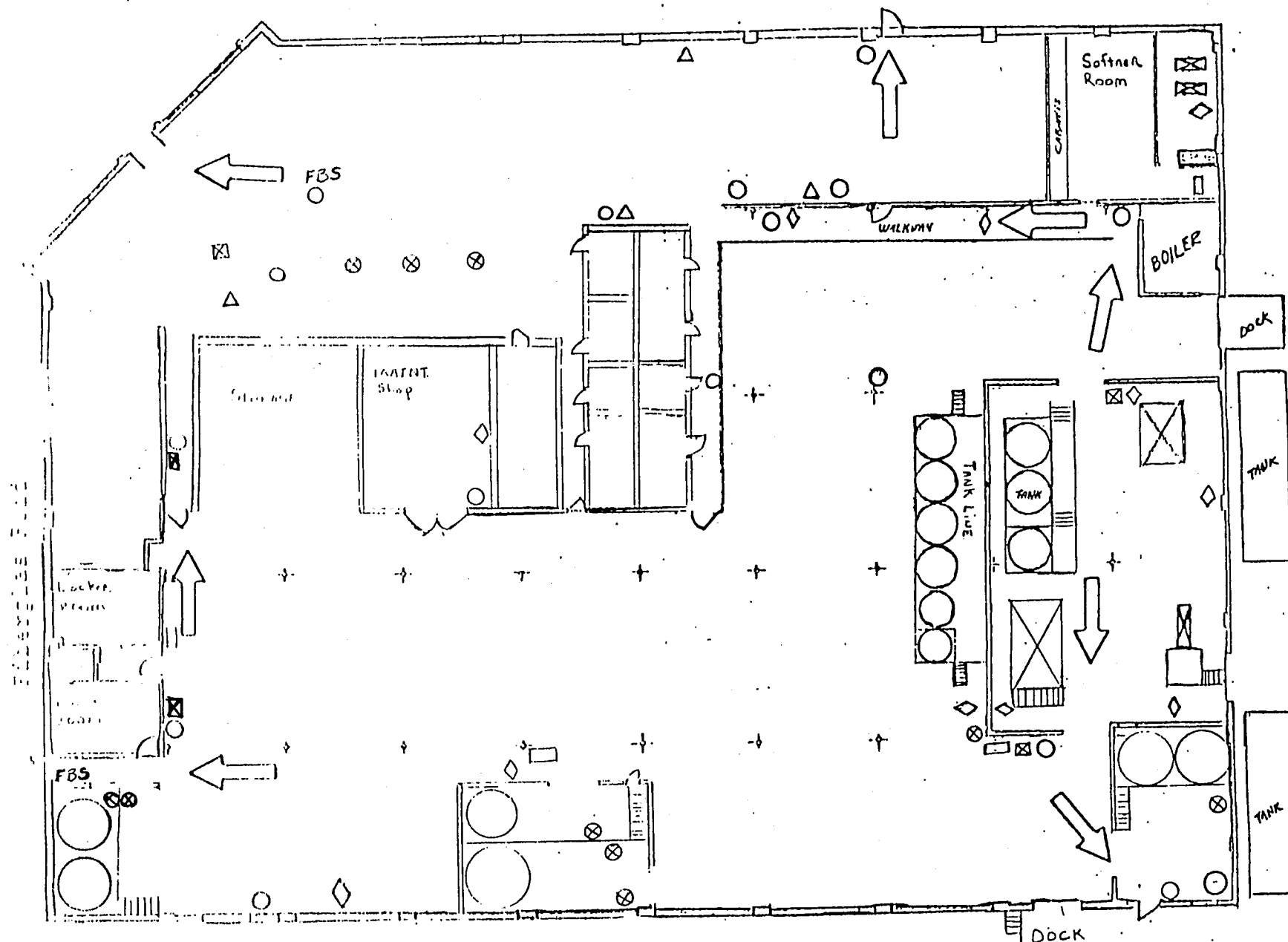
- A. Evacuation is signaled by two siren alarms which can be switched on at any of four activating switches in the 3155 Fiberglass Road Building (see diagram).
- B. Evacuation routes are designated with large arrows on the attached building diagrams.

V. Fire Emergency Procedures:

- A. Fire alarms are to be activated to signal for plant evacuation. All persons are to evacuate to a point outside of the plant by the nearest marked exit route (see diagrams) and, if possible, upwind from the fire with the exception of plant operating personnel familiar with and trained to use fire fighting equipment.
- B. Fire Department is to be called by activating one of the two fire boxes or calling 371-2121. If there are any injuries, the above number should be used to report both the fire and the injuries.
- C. Emergency coordinator is to determine whether or not trained personnel should contain the fire with on-site equipment until the fire department arrives.
- D. If the emergency coordinator determines that the fire cannot be safely contained by trained Olin personnel, then he is to instruct all personnel to evacuate the fire area and to direct the Fire Department to the fire on its arrival.
- E. Emergency coordinator will identify the character, source, quantity, and areal extent of any releases of hazardous materials and the potential hazards, if any, posed to human health or the environment.
 - 1. If the emergency coordinator determines that a release that could threaten human health or the environment off-site may have occurred, he will report this finding as follows:
 - a. Notify the National Response Center immediately at 800-424-8802 and report the following information:
 - 1) Name and telephone number of the reporter;
 - 2) Name and address of the plant;
 - 3) Time and type of incident (fire);
 - 4) Name and quantity of materials involved, to the extent known;
 - 5) Extent of injuries, if any; and
 - 6) Possible hazards to human health or the environment, off-site.

- b. Notify the City of Kansas City Water Pollution Control Department, Mr. Carlos Knight (371-2000).
 - c. Notify the Kansas Department of Health & Environment, Mr. John Paul Goetz (1-862-9360).
 - 2. If it is determined that evacuation of local areas may be advisable, the emergency coordinator will so inform the Fire Department.
 - F. Emergency coordinator is to determine what reasonable measures can be safely undertaken to move to safety any hazardous materials threatened by potential spread of the fire and to take any other measures appropriate for reducing the possibility of the fire spreading.
 - G. Following the fire emergency, the emergency coordinator is to take the steps specified at 40 CFR 264.56(g)-(j).
- VI. First aid may be administered, if appropriate, by one of the following first-aid officers who are qualified by Red Cross training:
- A. Niles Seawood (Lab Supply)
 - b. Marcia Rumans (Lab Supply)
 - C. Bill Whiles (Plant)
 - D. Donna Looney (Plant)

Sunshine Road



Rectangle - Fire Hoses

Circle - Fire Extinguishers

Diamond - Power Panels

Triangle - Safety Equip. - First Aid

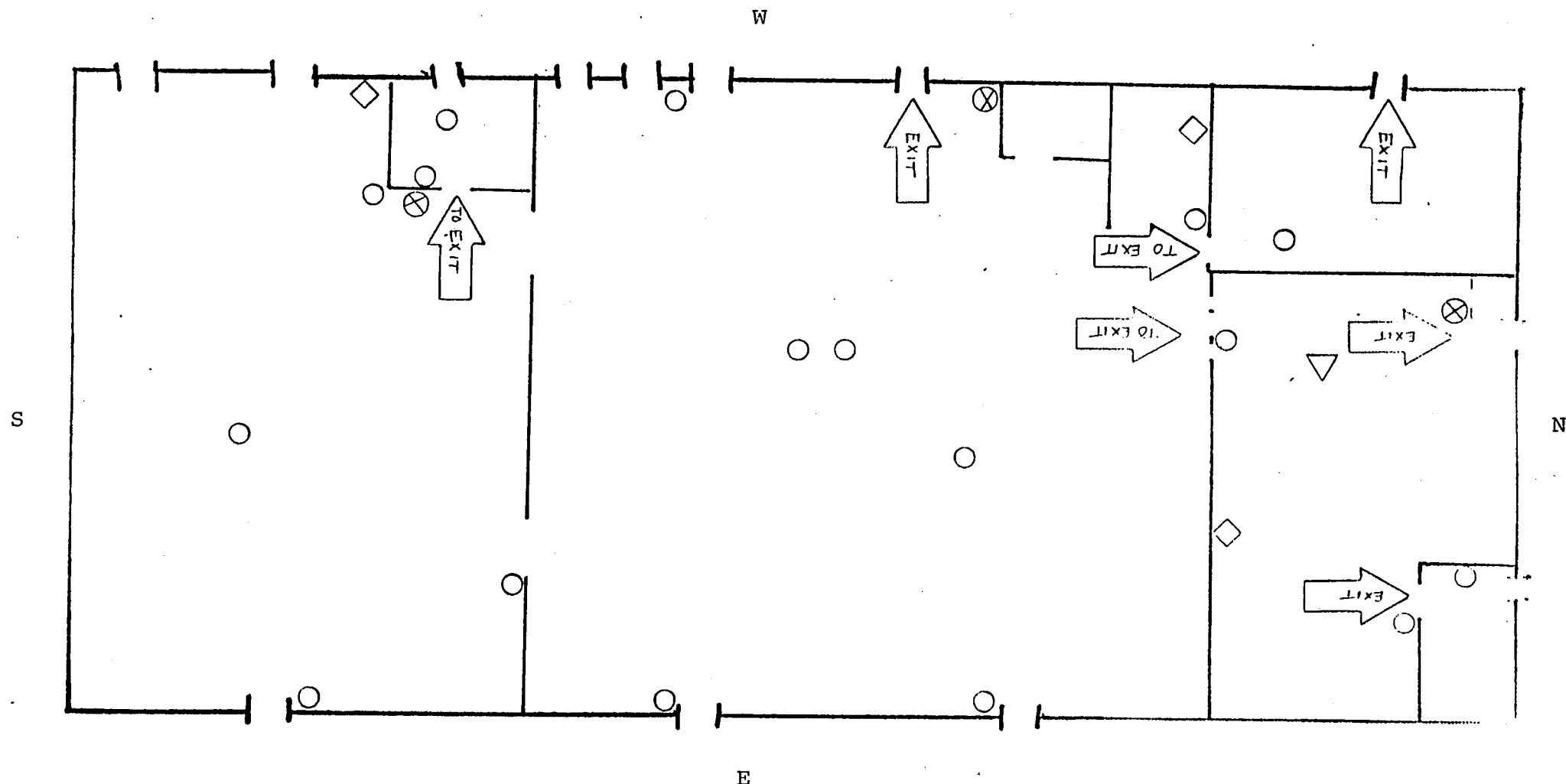
Arrow - Emergency Exit

Circle with cross - Safety shower

Eye wash station

Square with cross - Fire Alarm

FBS - Fire Box Switch



- | | |
|-------------------|--------------------------------------|
| Rectangle | - Fire Hoses |
| Circle | - Fire Extinguishers |
| Diamond | - Power Panels |
| Triangle | - Safety Equip. - First Aid |
| Circle with Cross | - Safety Showers & Eye Wash Stations |
| Arrow | - Emergency Exit |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

MAY 26 1981

Chief Lawrence Bowers
City of Kansas City, Kansas
Fire Department
815 North 6th Street
Kansas City, Kansas 66111

Dear Chief Bowers:

Subtitle C of the Resource Conservation and Recovery Act of 1976, as amended, requires safe handling of hazardous wastes. This Act defines hazardous waste and establishes a cradle-to-grave management system, including standards for generators, transporters and those facilities which treat, store or dispose of hazardous waste. If the owner or operator of a facility which treats, stores or disposes of hazardous waste, submits a permit application and meets certain standards, he is treated as having been issued a permit. The Environmental Protection Agency (EPA) refers to such an owner or operator as having "interim status."

As part of the interim status standards, owners or operators are required to develop and maintain at their facilities an emergency (contingency) plan. Copies of this contingency plan are required to be submitted to those local police and fire departments which would respond to any emergency situation at the facility. The hazardous waste interim status regulations also require that the contingency plan be amended if it falls during an emergency or the facility changes its design, construction or maintenance in a way that increases the potential for fire, explosion or other unplanned discharges of hazardous waste into the environment.

The EPA would like to work closely with the Kansas City Fire Department concerning the submittal and your evaluation of these contingency plans. The EPA is also interested in what cooperative measures have been made between the Fire Department, local police and other local health and safety agencies that respond to emergency situations such as fires, tornados or sudden releases of toxic chemicals. (See Section 265.53 of enclosed regulations).

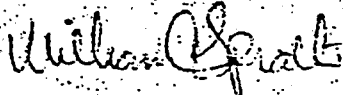
The EPA is requesting the name and phone number of the person or branch that the Fire Department has assigned to handle these contingency plans as they arrive. The EPA staff would like to arrange a meeting with the Kansas City Fire Department staff to discuss our enforcement plans and how these contingency plans may be of use to the Kansas City Fire Department.

Enclosed is a list of those treatment, storage or disposal facilities operating

in Kansas City, Kansas. If you have already received contingency plans from some of these local facilities, would you please provide us with a list of their names and addresses.

If you have any questions concerning this, please contact me at 816/374-5283. The member of my staff who is most familiar with this subject, Wayne Kaiser, 816/374-6487, can also provide additional information.

Sincerely,



Louise D. Jacobs
Director
Enforcement Division
Region VII

Enclosures (2)

cc: John Paul Goetz
Marvin W. Glotzbach
Kansas Department of Health and Environment



TO W. W. Bradley Kansas City, KS
 Y. T. Hsu AT Kansas City, KS DATE July 22, 1981
 FROM B. M. Madsen AT Overland Park, KS COPY TO R. T. Call
 SUBJECT RCRA EMERGENCY PLANS

The attached letter from EPA was left with Dr. Y. T. Hsu during a recent visit by Fire Inspector, Gary D. Boyert. I discussed the letter and the matter of emergency plans required under RCRA with Inspector Boyert. It was concluded that there will be no action required as a result of this letter or his visit.

The backround to both the letter and the visit is that the Fire Department was given a list of all companies who had notified EPA as being hazardous waste generators under the recent regulatory requirement of RCRA. It was assumed by EPA that the Fire Department and other emergency services, such as the Police Department, would want to obtain copies of the emergency (contingencies) plans required under the new RCRA regulations. Inspector Boyert explained that after receiving the letter from EPA and making a number of visits to hazardous waste generators, such as Olin Water Services, he concluded that they did not want copies of any emergency plans. In fact, he felt that having the emergency plans would simply confuse the handling of a given emergency because no one in the Fire Department would have the time or be able to read a plan before responding to an emergency. Thus, Inspector Boyert resolved the matter with EPA simply by stipulating that the Fire Department did not want copies of any emergency plans. We, therefore, need not submit copies of our emergency plans to the Fire Department as requested in the attached May 26, 1981 EPA letter.

We must, however, develop and keep current an emergency (contingency) plan which encompasses the handling of stored hazardous waste in order to comply with the new RCRA regulations. By copy of this memo, it is requested that Dick Call initiate a re-write of our existing Kansas City Emergency Plan in coordination with Messrs. Bradley and Hsu to ensure that the plan complies with the newly established requirements of the RCRA regulations. As I recall, our last Olin Corporate Safety Inspection also requested a re-write of our emergency plans which were obsoleted as a result of the construction of our new laboratory.

Dick, let me know how I can help in the development of this new emergency plan.

Blaine M. Madsen

BMM:cbt

Attachment

122.25(a)(8): A description of procedures, structures, or equipment used at the facility to:

- (i) Prevent hazards in unloading operations (for example, ramps, special forklifts);

The entire north side of the storage facility is a ramp which is designed to be easily negotiable with a standard forklift. The slope of the ramp is 1.5 inches over one foot. Drums will be placed on wood pallets and will be stacked to no more than four levels. Adequate aisle space for safe operation of the forklift is to be maintained at all times and will be inspected for on a weekly basis (see Section 122.25(a)(5) inspection schedule).

- (ii) Prevent runoff from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding (for example, berms, dikes, trenches);

Runoff from the facility itself will be directed to a trench at the south side of the facility by virtue of a gradual southward slope in the facility's floor. This trench in turn will direct flow to a sump. The trench, the sump, and the space beneath the pallets will together provide sufficient capacity to receive ten percent of the maximum possible quantity of free liquid in the facility in addition to the runoff from a nine inch rainfall. (The most severe 24-hour rainfall in the last 30 years measured 8.82 inches according to the National Weather Service.) The facility's storage floor will be rimmed by a curb which will extend to a uniform height of nine inches above ground level on all sides except for the north side where the facility's storage floor is at its maximum height of nine inches. This design insures that runoff from the storage area itself will be contained.

Runoff from hazardous waste handling areas other than the storage facility would be limited to minor spills that would be readily controllable by application of a liquid vacuum pump or mineral spill adsorbent such as vermiculite. There are no significant grades anywhere on the plant site that would allow for uncontrollable runoff of hazardous waste.

Protection of wastes in storage from flooding is provided by the curbing on the south, east and west sides of the facility and the ramp on the north side of the facility which together constitute a continuous ring of protection against flood waters to a height of nine inches. Drums are further protected from flooding by being raised on pallets. As indicated above, the storage facility is sumped with capacity for collection of nine inches of rainfall in addition to ten percent of the maximum possible quantity of free liquids that could be in storage in the facility. Finally, it should be noted that in the event of flood waters which threaten to rise above the nine inches of protection surrounding the storage facility floor, wastes will be evacuated to the floor of the production building which is elevated approximately four feet above the mean ground level.

(iii) Prevent contamination of water supplies;

See response to (ii), above.

(iv) Mitigate effects of equipment failure and power outages;

Drum storage is not a mechanized method of hazardous waste management and, therefore, is not in any significant way subject to adverse consequences of equipment failure and power outages.

(v) Prevent undue exposure of personnel to hazardous waste (for example, protective clothing);

All operating personnel at the plant are issued and required to wear protective equipment which includes, at a minimum, safety glasses or goggles, a hard hat, and safety shoes or boots. Personnel in manufacturing operations where most of the hazardous waste handling is carried out are also issued respirators and neoprene wet suits. Extra safety equipment is kept in reserve. Personnel are instructed in the proper use of this equipment as part of the personnel training program (see Section 122.25(a)(12) personnel training program description).

122.25(a)(9): A description of precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes as required to demonstrate compliance with Section 264.17 including documentation demonstrating compliance with Section 264.17(c).

I. Identification of ignitable, reactive, or incompatible wastes.

A. Ignitable hazardous waste (D001).

1. Liquids with flash point less than 140°F. (60°C).
2. Powders.
 - a. Strong reducing agents.
 - b. Oxidizers as defined in 49 CFR 173.151.

B. Reactive hazardous waste (D003): powders that may react with water and/or may react if heated under confinement.

C. Incompatible combinations of wastes.

1. Oxidizers and reducing agents.
2. Oxidizers and ignitable liquids.
3. Oxidizers and most organics.
4. Water reactive hazardous wastes and highly aqueous waste materials.

II. Precautions against accidental ignition.

- A. Ignitable wastes and oxidizable wastes will be physically separated from wastes oxidizing agents.
- B. Hazardous waste that may react if heated under confinement will be protected by portable cover from radiant heat.
- C. Smoking will not be permitted in or around the facility.
- D. There will be no electrical connections in the facility.
- E. Integrity of containers will be checked during weekly inspections (see Section 122.25(a)(5)).

III. Precautions against accidental reaction: same as precautions listed in II, above, plus physical separation of water-reactive hazardous wastes from highly aqueous wastes.

122.25(a)(10): Traffic pattern, estimated volume (number, types of vehicles) and control (for example, show turns across traffic lanes, and stacking lanes (if appropriate); discuss access road surfacing and load bearing capacity; slow traffic control signals.

The subject facility is simply a small container storage area measuring 28 feet by 22.5 feet. It serves to store wastes generated on-site which are brought to it by means of standard forklifts. The capacity of the facility will be for 320 fifty-five gallon drums. Shipments of wastes to off-site facilities will probably not occur more than once per year and will not involve traffic management beyond that which is routinely practiced at the plant in the course of shipping and receiving products and raw materials. Furthermore, waste shipments will not characteristically be any more heavy than full shipments of product. No special consideration of this topic is appropriate in light of the limited scope of hazardous waste management operations to be practiced.

122.25(a)(11): Facility location information:

- (i) In order to determine the applicability of the seismic standard (Section 264.18(a)) the owner or operator of a new facility must identify the political jurisdiction (e.g., county, township, or election district) in which the facility is proposed to be located.

The container storage facility which is the subject of this application is to be constructed precisely in the location of the existing container storage facility at the Olin Water Services plant in Kansas City, Kansas. Kansas is not listed in the most recent publication of Appendix VI to 40 CFR Part 264 (46 Federal Register 57285, November 23, 1981).

- (ii) Not applicable (see response to 122.25(a)(11),(i) above).
- (iii) Owners and operators of all facilities shall provide an identification of whether the facility is located within a 100-year floodplain. This identification must indicate the source of data for such determination and include a copy of the relevant Federal Insurance Administration (FIA) flood map, if used, or the calculations and maps used where a FIA map is not available....

The entire Olin Water Services Kansas City plant is within the Fairfax-Jersey Creek Levy Unit as designated by the U.S. Army Corps of Engineers. This is an area which is shown on the attached FIA Flood Insurance Rate Map as being protected from a 500 year flood.

- (iv) Not applicable (see response to 122.25(a)(11)(iii), above).

122.25 (a)(12): An outline of both the introductory and continuing training programs

- I. General note: In as much as the hazardous waste generated consists almost entirely of regular production products that have become off-specification or obsolete, the development of a separate training program dedicated to the topic of hazardous waste handling would essentially serve no purpose. Consequently, instruction on hazardous waste handling is incorporated into the plant's well-established safety training program.
- II. Names, job titles/descriptions of personnel that do handle or may handle hazardous waste (more detailed job descriptions available in the plant's personnel files):
 - Larry Prouty - Supervisor
 - William Dame - Supervisor
 - Glen Jenkins - Plant Manager
 - William Whiles - Truck/Utility Operator
 - Anthony Barnett - Utility Operator
 - Donald Franklin - Utility Operator
 - Anselmo Hernandez - Utility Operator
 - Darrel Lewellen - Utility Operator
 - Thomas Hicks - Maintenance Man
 - John Dobbins - Maintenance Man
 - George Johnson - Warehouseman/Shipping
 - Donna Looney - Warehouseman/Shipping
 - Marion Hitt - Supervisor of Analytical Services
 - Dwight Hammons - Chemist
 - Joe Mihelic - Chemist
- III. Topics covered in the safety training program:
 - (A) Procedures for using, inspecting, repairing and replacing, as appropriate, all safety and emergency equipment.
 - (B) The appropriate use of safety equipment and protective gear including goggles, safety glasses, neoprene boots, neoprene suits, and respirators.
 - (C) Fire drills and response to fires, explosions, and spills.
 - (D) Operation of alarms.
 - (E) Reporting of any defective safety equipment or emergency equipment immediately.
 - (F) Hazardous Waste Management Contingency Plan.
- IV. Training records: safety meeting attendance records are maintained at the plant.

122.25(a)(13): A copy of the Closure Plan

See attached Closure Plan - Olin Water Services, KC.

CLOSURE PLAN
OLIN WATER SERVICES, KC

EPA Facility I.D. No: KSD000203638

Operator's Name: Olin Water Services, Olin Corporation

Operator's Address: 120 Long Ridge Road
Stamford, CT 06904

Operator's Phone No: (203) 356-2000

Facility's Mailing Address: 3155 Fiberglass Road
Kansas City, Kansas 66115

Facility's Location Address: 3155 Fiberglass Road
Kansas City, Kansas 66115

Facility's Phone No: (913) 621-6440

I. GENERAL FACILITY DESCRIPTION

A. Type of Facility:

Storage structure for drums.

B. Facility Size:

The proposed facility is to be a hazardous waste drum storage structure located in the southwestern corner of the plant's property. This drum storage facility will measure 28 feet by 22.5 feet and will have capacity for approximately 17,600 gallons (three hundred and twenty 55 gallon drums) of hazardous waste.

C. Facility Characteristics:

The hazardous waste drum storage area will essentially consist of a reinforced concrete slab protected from run-on on three sides by a nine inch curb and by an asphalt access ramp on the remaining side. The interior of the storage structure which

will provide 420 square feet of container storage space will be sloped away from the access ramp to a trench drain and sump which will provide drum leakage and run-off containment. Drums will be on pallets and may be stacked to four layers. The only auxiliary equipment associated with the hazardous waste drum storage area are forklifts.

D. Waste Characterization:

The hazardous wastes stored at the drum storage area may be any combination of the following:

| | <u>Hazardous Waste No.</u> | <u>Hazard Code</u> |
|----------------------------------|--------------------------------|-------------------------------|
| Pentachlorophenol | U242 | Toxic |
| n-Butyl Alcohol | U031 | Toxic, Ignitable |
| 1, 2-Dichlorobenzene | U070 | Toxic |
| Ethylenebisdithiocarbamate | U114 | Toxic |
| Hydrazine | U113 | Toxic, Reactive |
| Ignitable Hazardous Waste | D001 | Ignitable |
| Corrosive Hazardous Waste | D002 | Corrosive |
| Reactive Hazardous Waste | D003 | Reactive |
| Chromium bearing hazardous waste | D007 | Extraction Procedure Toxic |

E. Schedule for Final Closure:

1. There is no estimate of the year of closure at present. The engineering life of the facility is estimated to be approximately 25 years.

2. The final date on which waste will be accepted into the drum storage area will be 180 days after cessation of manufacturing operations.
3. All drummed hazardous waste in the drum storage area that was generated by manufacturing operations will be removed to an approved hazardous waste treatment, storage or disposal site within two (2) months of final acceptance of drummed waste or within two (2) months of approval of the closure plan, whichever is later.
4. All hazardous wastes generated during decontamination operations will be drummed, placed in the drum storage facility, and removed to an approved treatment, storage or disposal site within the next month.
5. Certification by the owner and by an independent registered professional engineer that the facility has been closed in keeping with the specifications of the approved closure plan will be provided to the Kansas Department of Health and Environment and the U.S. EPA Regional Administrator within the next three (3) months.

II. MAXIMUM INVENTORY AND EXTENT OF OPERATION

A. Inventory:

The maximum inventory of hazardous waste possible at the time of cessation of manufacturing operations is estimated to be approximately 130% of the capacity of the drum storage facility,

or roughly 23,000 gallons. This estimate is based on the premise that the crushing and drumming of pallets and drumming of miscellaneous implements and the decontamination of forklifts and the hazardous waste drum storage area itself could add roughly 850 gallons of hazardous waste to the maximum possible quantities of 17,600 gallons in storage and 4,570 gallons in the containment system. All of this material will be removed from the site in 55 gallon drums and taken to an approved treatment, storage or disposal site.

B. Extent of Operation:

The maximum extent of hazardous waste management operations ever to be active at the plant is fully accounted for by the referenced capacity of the proposed hazardous waste drum storage facility.

III. METHODS OF CLOSURE

Drums will be removed by a registered and approved hazardous waste transporter to an approved offsite treatment, storage or disposal site. The forms of treatment that will be specified will be incineration or an appropriate form of biological, physical, or chemical treatment.

IV. DECONTAMINATION PROCEDURES

Once drummed waste generated from manufacturing operations has been taken offsite, the hazardous waste storage facility will be inspected and decontaminated, as necessary. At a minimum the entire facility will

be washed with a detergent solution and rinsed thoroughly with water. Steam cleaning may be employed, if necessary. All wash waters will be tested for hazardous waste characteristics; hazardous waste wash waters will be drummed and removed to an approved off-site hazardous waste treatment facility. Forklifts will be decontaminated in a like fashion, and wash waters so generated will be likewise drummed and sent off-site to an approved treatment facility.

V. CLOSURE CERTIFICATION

Closure of the drum storage area will be supervised by Olin and an independent registered professional engineer. They will both submit certification to the Regional Administrator when closure has been completed in accordance with the approved closure plan. The certifying engineer will make two (2) inspections during closure; the first will be a familiarization inspection shortly after plant shutdown, and the other will be the final inspection when closure is complete.

SECTION NOT APPLICABLE

122.25(a)(15): The most recent closure cost estimate for the facility prepared in accordance with Section 264.142 plus a copy of the financial assurance mechanism adopted in compliance with Section 264.143.

The current closure cost estimate for the Olin Water Services Kansas City plant is \$50,000. The attached correspondence to the Regional Administrator of the EPA Region IV office dated January 12, 1983 contains a comprehensive financial test demonstration of, among other things, Olin Corporation's overall capability to assume financial responsibility for closure costs at all of its hazardous waste management facilities. As the RCRA regulations require an annual update of the financial test within 90 days after the close of the fiscal year, a revised financial test will be submitted to the Kansas Department of Health and Environment by March 31, 1983. This new financial test demonstration^{will} use updated closure cost estimates. The updated closure cost estimate for the Olin Water Services Kansas City plant will be \$55,000.



120 LONG RIDGE ROAD, P.O. BOX 1355, STAMFORD, CT 06904-1355

January 12, 1983

Regional Administrator - Region IV
Environmental Protection Agency
345 Courland Street, N.E.
Atlanta, GA 30308
Attention: RCRA Financial Requirements

Gentlemen:

I am the chief financial officer of Olin Corporation, 120 Long Ridge Road, Stamford, CT 06904. This letter is in support of the firm's use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265.

| <u>Name of Facility</u> | <u>Address or Location</u> | <u>EPA Identification Number</u> |
|-------------------------|---|--|
| Augusta Plant | P.O. Box 1234 Augusta, GA 30913 | GAD-040690737 |
| Charleston Plant | P.O. Box 248 Charleston, TN 37310 | TND-003337292 |
| Lake Charles Plant | P.O. Box 2896 Lake Charles, LA 70602 | LAD-008080681 |
| McIntosh Plant | P.O. Box 28 McIntosh, AL 36553 | ALD-008188708 |
| Moundsville Plant | P.O. Box 596 Moundsville, WV 26041 | WVD-980555239 |

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

| | <u>Closure Cost</u> | <u>Post- Closure Cost</u> |
|--|-------------------------|-----------------------------------|
| E.P.A. I.D. No. OHD 001813708 Ashtabula Plant P.O. Box 206 Ashtabula, OH 44004 | \$ 177,000 | \$ - |
| E.P.A. I.D. No. GAD 040690737 Augusta Plant P.O. Box 1234 Augusta, GA 30913 | 900,000 | 168,000 |
| E.P.A. I.D. No. TXD 008097487 Beaumont Plant P.O. Box 30 Beaumont, TX 77704 | 56,000 | - |
| E.P.A. I.D. No. CAD 009702564 Benecia Plant Benecia Industrial Park P.O. Box 847 Benecia, CA 94510 | 2,000 | - |
| E.P.A. I.D. No. OHD 045214947 Brook Park Plant 6367 & Rear Eastland Rd. Brook Park, OH 44142 | 43,000 | - |
| E.P.A. I.D. No. TND 003337292 Charleston Plant P.O. Box 248 Charleston, TN 37310 | 1,600,000 | 1,500,000 |
| E.P.A. I.D. No. KYD 006396246 Doe Run Plant P.O. Box 547 Brandenburg, KY 40108 | 32,000 | - |
| E.P.A. I.D. No. ILD 000802819 East Alton Casting Plant East Alton, IL 62024 | 14,205 | - |
| E.P.A. I.D. No. ILD 006271696 East Alton Plant East Alton, IL 62024 | 42,701 | - |

| | | |
|---|-----------|---------|
| E.P.A. I.D. No. PAD 047353172 Fogelsville Plant P.O. Box 300 Fogelsville, PA 18051 | \$ 6,000 | \$ - |
| E.P.A. I.D. No. ILD 049809379 Joliet Plant P.O. Box 2219 Joliet, IL 60434 | 22,000 | - |
| E.P.A. I.D. No. LAD 008080681 Lake Charles Plant P.O. Box 2896 Lake Charles, LA 70602 | 800,000 | 750,000 |
| E.P.A. I.D. No. MSD 007035843 Leland Plant Drawer B Leland, MS 38756 | 105,000 | - |
| E.P.A. I.D. No. ALD 008188708 McIntosh Plant P.O. Box 28 McIntosh, AL 36553 | 1,000,000 | - |
| E.P.A. I.D. No. ILD 000802801 Meridian Energy Technical Systems Operation Drawer G Marion, IL 62959 | 21,750 | - |
| E.P.A. I.D. No. CTD 052544376 Middletown Plant 475 Smith Street Middletown, CT 06457 | 30,000 | - |
| E.P.A. I.D. No. WVD 980555239 Moundsville Plant P.O. Box 596 Moundsville, WV 26041 | 1,200,000 | - |
| E.P.A. I.D. No. CTD 001451004 New Haven Research Center 275 Winchester Avenue New Haven, CT 06511 | 61,000 | - |
| E.P.A. I.D. No. NYD 002123461 Niagara Falls Plant P.O. Box 748 New York, NY 14302 | 320,000 | - |

| | | |
|---|-----------|---|
| E.P.A. I.D. No. ILD 006317473 Ordill Industrial Area Technical Systems Operations Drawer G Marion, IL 62959 | \$ 38,412 | - |
| E.P.A. I.D. No. KSD 000203638 Kansas City Plant (OWS) 51 Corporate Woods 9393 West 110th Street Overland Park, KS 66210 | 50,000 | - |
| E.P.A. I.D. No. NYD 068212695 New York Plant (OWS) 615 West 131st Street New York, NY 10027 | 7,000 | - |
| E.P.A. I.D. No. NYD 002220804 Rochester Plant P.O. Box 205 Rochester, NY 14611 | 245,000 | - |
| E.P.A. I.D. No. FLD 047094524 St. Marks Powder Operation P.O. Box 222 St. Marks, FL 32355 | 23,000 | - |
| E.P.A. I.D. No. LAD 052528965 Shreveport Plant P.O. Box 5098 Shreveport, LA 71105 | 1,000 | - |
| E.P.A. I.D. No. CTD 053704110 Waterbury Plant P.O. Box 270 Waterbury, CT 06720 | 548 | - |
| E.P.A. I.D. No. MAD 001403104 Wilmington Plant 51 James Street Wilmington, MA 01887 | 245,000 | - |

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.
4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31st. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

Alternative I

| | |
|--|-----------------|
| 1. Sum of current closure and post-closure cost estimates | \$ 9,460,616 |
| 2. Amount of annual aggregate liability coverage to be demonstrated | \$ 6,000,000 |
| 3. Sum of lines 1 and 2 | \$ 15,460,616 |
| * 4. Total liabilities | \$824,847,000 |
| * 5. Tangible net worth | \$781,707,000 |
| * 6. Net worth | \$793,187,000 |
| * 7. Current Assets | \$669,635,000 |
| * 8. Current liabilities | \$376,339,000 |
| * 9. Net working capital | \$293,296,000 |
| *10. The sum of net income plus depreciation, depletion and amortization | \$214,802,000 |
| *11. Total assets in U.S. | \$1,450,537,000 |

| | YES | NO |
|--|-----|----|
| 12. Is line 5 at least \$10 million? | X | . |
| 13. Is line 5 at least 6 times line 3? | X | |
| 14. Is line 9 at least 6 times line 3? | X | |
| *15. Are at least 90% of firm's operating assets located in the U.S.:? If not, complete line 16. | | X |
| 16. Is line 11 at least 6 times line 3? | X | |
| 17. Is line 4 divided by line 6 less than 2.0? | X | |
| 18. Is line 10 divided by line 4 greater than 0.1? | X | |
| 19. Is line 7 divided by line 8 greater than 1.5? | X | |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

E. P. Lyons
Edward P. Lyons
Vice-Chairman and *134 WSA*
Chief Financial and
Administrative Officer

Date: _____

/sp

Letter Recipients - Other Regional Offices:

Regional Administrator - Region III



Peat, Marwick, Mitchell & Co.

Certified Public Accountants

Stamford Square
3001 Summer Street
Stamford, Connecticut 06905

January 12, 1983

The Board of Directors
Olin Corporation

We have examined the consolidated financial statements of Olin Corporation and consolidated subsidiaries as of and for the year ended December 31, 1981 and have issued our report thereon dated January 29, 1982. We did not perform audit tests for the purpose of expressing an opinion on the individual amounts such as those enumerated below and, accordingly, we express no opinion thereon.

However, at your request we have compared certain data listed under Alternative I in your financial responsibility letters to U.S. Environmental Protection Agency Regional Administrators and to State Environmental Administrators. Our procedures were as follows:

1. We compared total liabilities of \$824,847,000 to the December 31, 1981 consolidated balance sheet by combining the following line items:

| | |
|------------------------------|----------------------|
| Total current liabilities | \$376,339,000 |
| Long-term debt | 298,936,000 |
| Deferred income taxes | 86,869,000 |
| Other noncurrent liabilities | 62,703,000 |
| | <u>\$824,847,000</u> |

2. We computed tangible net worth of \$781,707,000, which was determined as follows:

| | |
|--|----------------------|
| Stockholders' equity on the December 31, 1981 consolidated balance sheet | \$793,187,000 |
| Less Goodwill, patents and trademarks | <u>11,480,000</u> |
| | <u>\$781,707,000</u> |

3. We compared net worth of \$793,187,000 to the December 31, 1981 consolidated balance sheet which represents total stockholders' equity and found them to be in agreement.

4. We compared total current assets of \$669,635,000 to the caption "total current assets" on the December 31, 1981 consolidated balance sheet and found them to be in agreement.
5. We compared total current liabilities of \$376,339,000 to the caption "total current liabilities" on the December 31, 1981 consolidated balance sheet and found them to be in agreement.
6. We compared the sum of net income plus depreciation, depletion and amortization of \$214,802,000 to the December 31, 1981 financial statements which was determined as follows:

| | |
|-------------------------------------|---------------|
| Net income on the December 31, 1981 | |
| Consolidated statement of income | \$ 92,836,000 |

| | |
|-----------------------------------|----------------------|
| Depreciation as disclosed on the | |
| December 31, 1981 consolidated | |
| statement of changes in financial | |
| position line item "depreciation" | <u>121,966,000</u> |
| | <u>\$214,802,000</u> |

7. We compared total operating assets in the U.S. of \$1,450,537,000 to the December 31, 1981 Notes to Financial Statements captioned "Segment Information", which includes a table on page thirty-two of the Olin Corporation Annual Report 1981, to the line Assets United States of \$1,450,537,000.
8. We determined that the Corporation's U.S. operating assets of \$1,450,537,000 at December 31, 1981 to be less than 90% as follows:

| | |
|---------------------------------|------------------|
| Total U.S. operating assets per | |
| item 7 above | \$ 1,450,537 (A) |

| | |
|----------------------------------|---------------|
| Total consolidated assets on the | |
| December 31, 1981 balance sheet | 1,618,034 (B) |

$$\frac{(A)}{(B)} = \underline{\underline{89.6\%}}$$

The procedures enumerated above were performed solely to assist you in submission of your letter to the U.S. Environmental Protection Agency Regional Administrators and State Environmental Administrators as discussed in the second paragraph of this letter and is not to be used for any other purpose. Based upon the procedures performed, nothing came to our attention which would cause us to believe that the above data requires adjustment.

Leah Mawick Mitchell & Co.

SECTION NOT APPLICABLE

122.25(a)(17): Where applicable, a copy of the insurance policy or other documentation which comprises compliance with the requirements of Section 264.147

The attached Certificate of Liability Insurance was submitted to all Regions of EPA in which Olin Corporation has hazardous waste management facilities under a July 12, 1982 cover letter. A new demonstration of financial liability coverage will be included in a comprehensive financial test demonstration update to be submitted to the Kansas Department of Health and Environment by March 31, 1983. A certificate of liability insurance will not be relied upon to demonstrate Olin's compliance with Section 264.147 once this financial test demonstration is submitted.



120 LONG RIDGE RD., STAMFORD, CONN. 06904

July 12, 1982

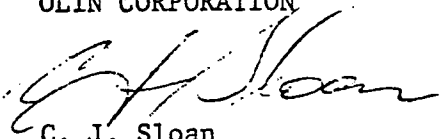
Regional Administrator - Region VII
Environmental Protection Agency
324 E. 11th Street
Kansas City, MO 64106
Attention: RCRA Financial Requirements

Gentlemen:

In accordance with the rules promulgated under 40 CFR 264.147 or 265.147, Olin hereby submits a Certificate of Liability Insurance to demonstrate financial responsibility for sudden and accidental occurrences.

Very truly yours,

OLIN CORPORATION



C. J. Sloan
Manager, Casualty Risks

CJS:mac
Attachment

Letter Recipients - Other Regional Offices:

Regional Administrator - Region I
Regional Adminintrator - Region II
Regional Administrator - Region III
Regional Administrator - Region IV
Regional Administrator - Region V
Regional Administrator - Region VI
Regional Administrator - Region IX

O L I N C O R P O R A T I O N

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: National Union Fire Insurance Co.
Address of Insurer: 70 Pine Street
New York, New York

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: Olin Corporation
Address of Insured: 120 Long Ridge Road
Stamford, Connecticut 06904

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for "sudden accidental occurrences." The limits of liability are \$ 1,000,000.00 each occurrence and \$ 2,000,000.00 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number [REDACTED] issued on 3-1-82. The effective date of said policy is 3-1-82. Ex. 4

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

SCHEDULE

| <u>Name of Facility</u> | <u>Address or Location</u> | <u>EPA Identification Number</u> |
|-------------------------|----------------------------|--|
|-------------------------|----------------------------|--|

(See attached schedule)

Robert E. Lorier Sr. Underwriter
Authorized Representative & Title

(Type Name) Robert E. Lorier

Name of Insurer National Union Fire Insurance Co.

Address of Insurer 70 Pine Street, New York, New York

| <u>Name of Facility</u> | <u>Address or Location</u> | EDA <u>Identification Number</u> |
|---|---|---|
| Ashtabula Plant | P.O. Box 206 Ashtabula, Ohio 44004 | OHD-001813708 |
| Augusta Plant | P.O. Box 1234 Augusta, Georgia 30913 | GAD-040690737 |
| Beaumont Plant | P.O. Box 30 Beaumont, Texas 77704 | TXD-008097487 |
| Benecia Plant | Benecia Industrial Plant P.O. Box 847 Benecia, California 94510 | CAD-009702564 |
| Brook Park Plant | 6367 & Rear Eastland Rd. Brook Park, Ohio 44142 | OHD-045214947 |
| Charleston Plant | P.O. Box 248 Charleston, Tenn. 37310 | TND-003337292 |
| Doe Run Plant | P.O. Box 547 Braidenburg, Kentucky 40108 | KYD-006396246 |
| East Alton Casting Plant | East Alton, Illinois 62024 | ILD-006271696 |
| Fogelsville Plant | P.O. Box 300 Fogelsville, Pennsylvania 18051 | PAD-047353172 |
| Joliet Plant | P.O. Box 2219 Joliet, Illinois 60434 | ILD-049809379 |
| Lake Charles Plant | P.O. Box 2896 Lake Charles, Louisiana 70602 | LAD-008080681 |
| Leland Plant | Drawer B Leland, Mississippi 38756 | MSD-007035843 |
| McIntosh Plant | P.O. Box 28 McIntosh, Alabama 36553 | ALD-008188708 |
| Meridian Energy Technical Systems Operations | Drawer G Marion, Illinois 62959 | ILD-000802801 |
| Middletown Plant | 475 Smith Street Middletown, Connecticut 06457 | CTD-052544376 |
| Moundsville Plant | P.O. Box 596 Moundsville, W.V. 26041 | WVD-004374021 |
| New Haven Research Center | 275 Winchester Ave. New Haven, Connecticut 06511 | CTD-001451004 |

| <u>Name of Facility</u> | <u>Address or Location</u> | <u>EDA Identification Number</u> |
|--|---|--|
| Niagara Falls Plant | P.O. Box 748 New York, NY 14302 | NYD-002123461 |
| North Little Rock Plant | P.O. Box 398 North Little Rock, Ark. 72114 | ARD-006354542 |
| Ordill Industrial Area Technical Systems Operations | Drawer G Marion, Illinois 62959 | ILD-006317473 |
| Kansas City Plant (OWS) | 51 Corporate Woods 9393 West 110th St. Overland Park Kansas 66210 | KSD-000203638 |
| Los Angeles Plant (OWS) | 3312 Long Beach Ave, East Los Angeles, Calif. 90058 | CAD-076206507 |
| New York Plant (OWS) | 615 West 131st St. New York, NY 10027 | NYD-068212695 |
| Rochester Plant | P.O. Box 222 Rochester, NY 14611 | NYD-002220804 |
| St. Marks Powder Operation | P.O. Box 222 St. Marks, Florida 32355 | FLD-047094524 |
| Shreveport Plant | P.O. Box 5098 Shreveport, Louisiana 71105 | LAD-052528965 |
| Westbury Plant | P.O. Box 270 Waterbury, Connecticut 06720 | CTD-053704110 |
| Wilmington Plant | 51 James St. Wilmington, Mass. | MAD-001403104 |

SECTION NOT APPLICABLE

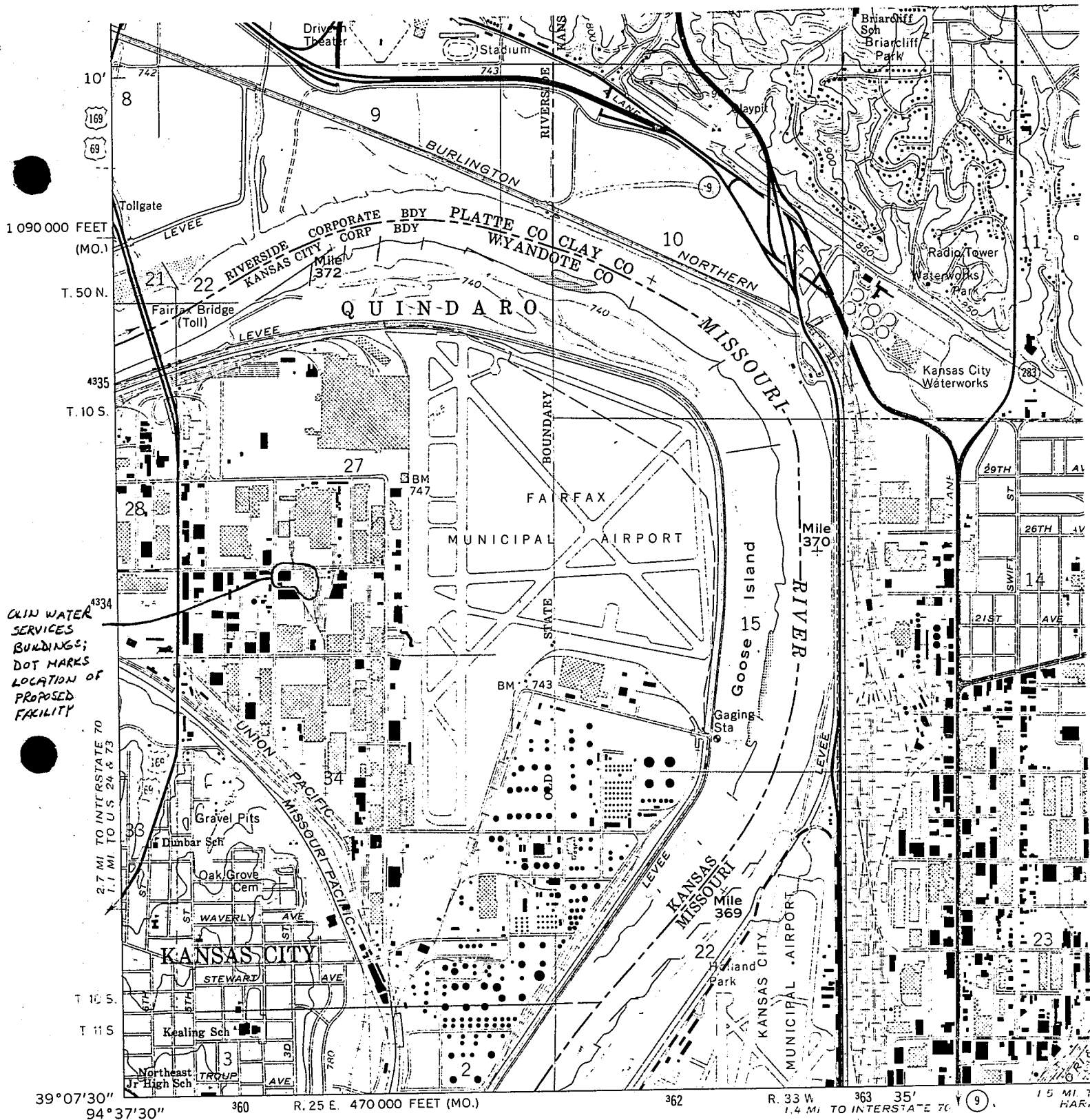
122.25(a)(19): A topographic map showing a distance of 1000 feet around the facility....

Attached are three maps, a wind rose, and well location data for the plant site area. One map is a USGS topographic map; one map is a sewer line map based on a regional sewer line map at the Fairfax Drainage District Office at 1620 Fairfax Traffic Way, Kansas City, Kansas; and the other map is a simple site plan of undetermined scale. The scale of the USGS map is one inch to 2,000 feet while the scale of the sewer line map is one inch to 100 feet.

The USGS map shows contour lines at intervals of five feet of relief. As can be seen from that map, there is no contour line through the plant site; the ground on which the plant is located is very flat. Run-off from heavy rainfalls can and does create puddling in certain areas of the plant site, including the southwest corner where the proposed storage facility is to be located. However, as described in Section 122.25(b)(1)(i)(D), the proposed facility is designed to protect stored containers from run-on.

The delineation of the 500-year flood protection zone in which the facility is located and of nearby surface water bodies is provided on the FIA flood map in Section 122.25(a)(11)(iii).

The surrounding land use is entirely industrial.



ON WATER
SERVICES
BUILDINGS;
DOT MARKS
LOCATION OF
PROPOSED
FACILITY

Mapped, edited, and published by the Geological Survey

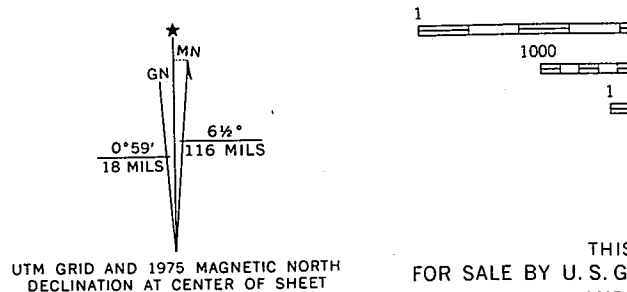
Control by USGS and USC&GS

Planimetry by photogrammetric methods from aerial photographs taken 1947. Topography by planetable surveys 1934-35. Revised from aerial photographs taken 1963. Field checked 1964

Polyconic projection. 1927 North American datum
10,000-foot grids based on Missouri coordinate system, west zone
and Kansas coordinate system, north zone
1000-metre Universal Transverse Mercator grid ticks,
zone 15, shown in blue

Red tint indicates areas in which only landmark buildings are shown

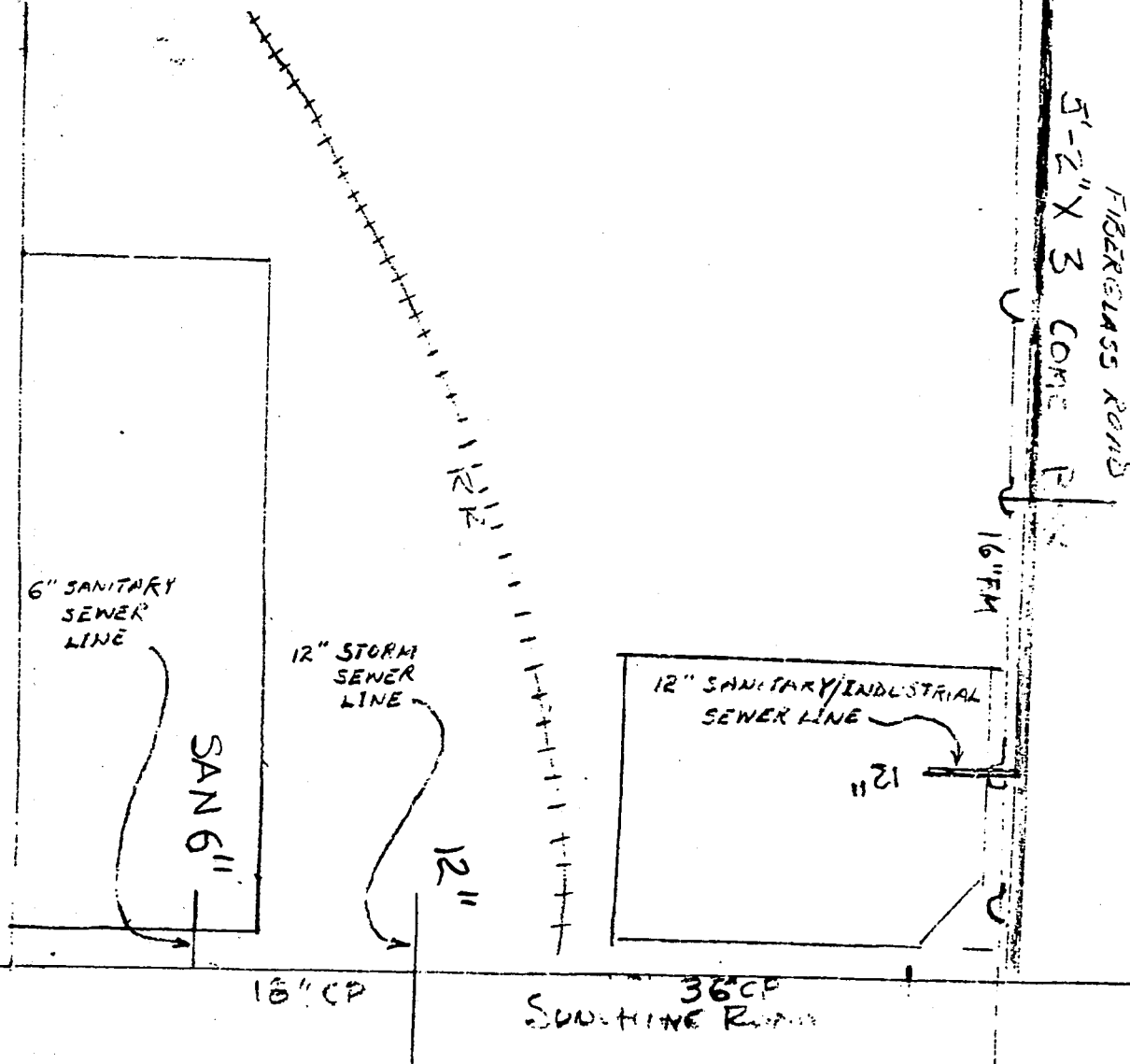
Fine red dashed lines indicate selected fence and field lines where generally visible on aerial photographs. This information is unchecked



THIS
FOR SALE BY U. S. G. I.
AND
MISSOURI
AN
A FOLDER D

(SHAWNEE)
7062 11 SW

SEWER LINE MAP



A

H.C.B. T & G. on PIK on Br. Jst.

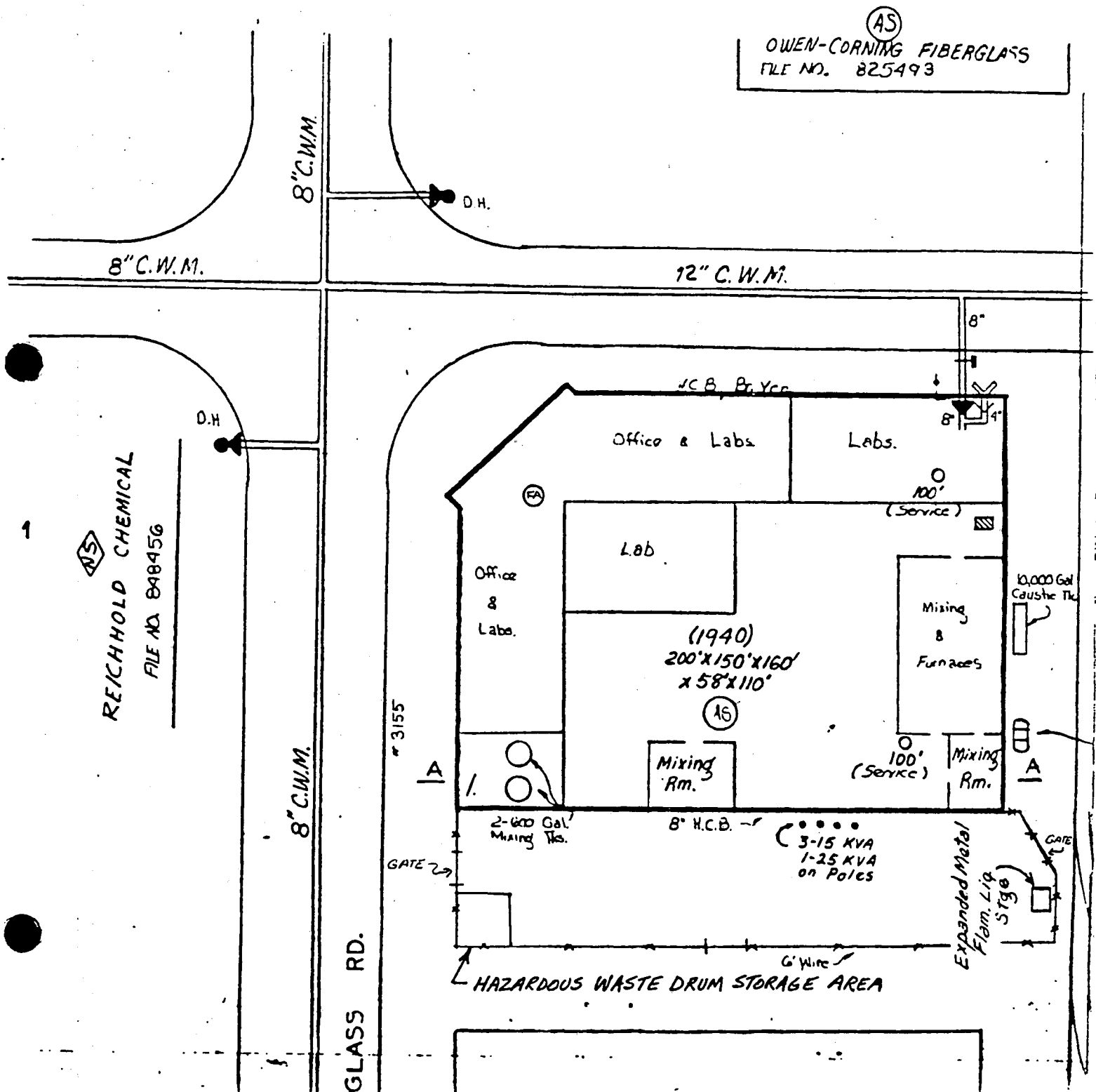
Br. Ven.

| | | | | |
|----------------|----------------|---------|----------------|---------|
| AS | AS Mfg & Sldg. | AS | AS Mfg & Sldg. | AS Mfg. |
| AS Mfg & Sldg. | | AS Labs | | |

H.C.B.

A - A

Conc.





UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
ENVIRONMENTAL DATA AND INFORMATION SERVICE
National Climatic Center
Federal Building
Asheville, N.C. 28801

Use of Annual Wind Rose for Climatic Applications

The attached wind rose was originally prepared for the FAA for aviation-related applications. The graph depicts wind direction versus wind speed during all weather conditions at a particular airport site. Extreme caution must be taken if this graph is used for other applications for the following reasons:

1. The graph is an annual distribution and does not take into account seasonal or monthly variations in wind speed and direction.
2. The graph does not take into account daily variations in wind speed and direction. For example, at most coastal locations a land-sea breeze is common during fair weather. During the day at Daytona Beach, Florida, 50.2 percent of all winds are easterly, while 35.3 percent are westerly. At night 33.4 percent are easterly, while 41.8 percent are westerly. Also, during the day 4.0 percent of all winds are calm compared to 12.9 percent at night.
3. The graph is for a particular airport site. Depending upon topography, the wind climate could be entirely different only a small distance away.

These problems could have serious implications if the annual graph is used for applications of short duration (hours, days, months). However, if the application is for time periods greater than a year, the attached graph is representative.



10TH ANNIVERSARY 1970-1980

National Oceanic and Atmospheric Administration

A young agency with a historic
tradition of service to the Nation

FOREWORD

INTRODUCTION

Summary tables and graphs have been prepared to assist the FAA in the application of establishment criteria for precision and non-precision approach and landing aids. These tables and graphs depict wind direction and speed under specified ceiling and visibility conditions. This report has been prepared by the National Climatic Center for the FAA under Interagency Agreement No. DOT-FA79WAI-057.

Climatological information for selected airports is presented in 11 volumes:

- Volume 1 - New England Region (ANE)
- Volume 2 - Eastern Region (AEA)
- Volume 3 - Southern Region (ASO)
- Volume 4 - Great Lakes Region (AGL)
- Volume 5 - Central Region (ACE)
- Volume 6 - Southwest Region (ASW)
- Volume 7 - Rocky Mountain Region (ARM)
- Volume 8 - Northwest Region (ANW)
- Volume 9 - Western Region (AWE)
- Volume 10 - Alaskan and Pacific Regions (AAL and APC)
- Volume 11 - Visibility Time Series for Key Stations

Summary tables and graphs are presented in volumes 1-10. Graphical time series of visibility measurements for key stations throughout the United States are presented in volume 11 to give the reader some insight into the climate variability that can be expected.

ELEMENT CLASSIFICATION

Twelve tables for each station depict wind direction vs. wind speed distributions. Half the tables show daytime distributions for six ceiling-visibility classes, and half show nighttime distributions for the same six ceiling-visibility classes. A graphical depiction of the data in each table is also presented. An additional graph for each station depicts the combined day and night winds for all ceiling-visibility conditions.

Wind direction is grouped according to a 16-point compass (N, NNE, NE, ENE, E, ESE, SE, SSE, S, SSW, SW, WSW, W, WNW, NW, NNW) plus calm. The wind speed groups are 0-3, 4-12, 13-15, 16-18, 19-24, 25-31 and equal to or greater than 32 mph.

The ceiling-visibility criteria are defined as:

CLASS 1 = ceiling equal to or greater than 1500 feet and visibility equal to or greater than 3 miles.

CLASS 2 = ceiling less than 1500 feet and/or visibility less than 3 miles.

CLASS 3 = ceiling less than 1500 feet and/or visibility less than 3 miles, but ceiling equal to or greater than 400 feet and visibility equal to or greater than 1 mile.

CLASS 4 = ceiling less than 400 feet and/or visibility less than 1 mile, but ceiling equal to or greater than 200 feet and visibility equal to or greater than 1/2 mile.

CLASS 5 = ceiling less than 200 feet and/or visibility less than 1/2 mile, but ceiling equal to or greater than 100 feet and visibility equal to or greater than 1/4 mile.

CLASS 6 = ceiling less than 100 feet and/or visibility less than 1/4 mile.

CLASS 7 = all ceiling and visibility conditions; sum of classes 1 and 2; also the sum of classes 1 and 3 through 6.

Time conditions are determined from the onset of civil twilight in the morning to the end of civil twilight in the evening. Civil twilight begins (ends) when the sun is six degrees below the horizon. It covers the somewhat indefinite period before sunrise and after sunset during which natural illumination usually remains sufficient for ordinary outdoor operations. For this report the morning (evening) times of beginning (ending) of civil twilight at a station are determined for the middle of a month. All data within this month are classified as either day or night according to these times.

DATA

The data used in the preparation of the climatological tables and graphs were extracted from the National Climatic Center's Tape Deck 1440 Hourly Surface Observations. The data contained in this deck have been digitized from the official observations recorded on station. From about 1948 through 1964 data were digitized for each hour in a day. From 1965 onward only every third hour's data were digitized. The tables and graphs in this report are based on eight observations per day (every third hour) for

the entire period of record. This was done to eliminate the data bias problems that would have been created by trying to mix the 24 observations per day prior to 1965 with the 8 observations per day after 1964.

The effect on the climatology of not using all the available data was examined for representative key stations in each region. Monthly day and night distributions were prepared for all ceiling-visibility criteria and wind speed and direction groups using 24 observations per day. A data subset was created by extracting every third observation from the hourly data set, and similar frequency distributions were prepared. The Kolmogorov-Smirnov test was applied to evaluate the hypotheses that distributions using 24 observations per day are statistically the same as distributions using 8 observations per day. The results of this procedure indicate equality

of distributions. Therefore, no significant information has been lost by basing the climatologies on 8 observations per day.

The tables and graphs are also available on microfiche, and the summarized data are available on magnetic tape. This report presents annual summaries, but monthly summaries can be generated on magnetic tape. Requests for microfiche copies of this report and for data on magnetic tape should be addressed to:

Director
National Climatic Center
Federal Building
Asheville, NC 28801

The requested microfiche copies and/or tapes will be provided at cost.

TABLE LEGEND

A = number of day (night) observations in a given ceiling-visibility class, wind speed class and direction divided by the total number of day (night) observations in ceiling-visibility classes 1, 3-6, all wind speed classes and directions times 100.

B = number of day (night) observations in a given ceiling-visibility class, wind speed class and direction divided by the total number of day (night) observations in the given ceiling-visibility class and direction times 100.

C = number of day (night) observations of a given direction divided by the total number of day (night) observations in ceiling-visibility classes 1, 3-6 times 100.

D = number of day (night) observations of a given direction divided by the total number of day (night) observations in the given ceiling-visibility class times 100.

E = number of day (night) observations in a given wind speed class divided by the total number of day (night) observations in ceiling-visibility classes 1, 3-6 times 100.

F = number of day (night) observations in a given wind speed class divided by the total number of day (night) observations in the given ceiling-visibility class times 100.

G = number of day (night) observations in the given ceiling-visibility class divided by the total number of day (night) observations in ceiling-visibility classes 1, 3-6 times 100.

100 = summation of column D = summation of row F.

H = average wind speed for the given day (night) ceiling-visibility class and direction.

I = average wind speed for the given day (night) ceiling-visibility class.

J = overall period of record; see station list for actual years of record used.

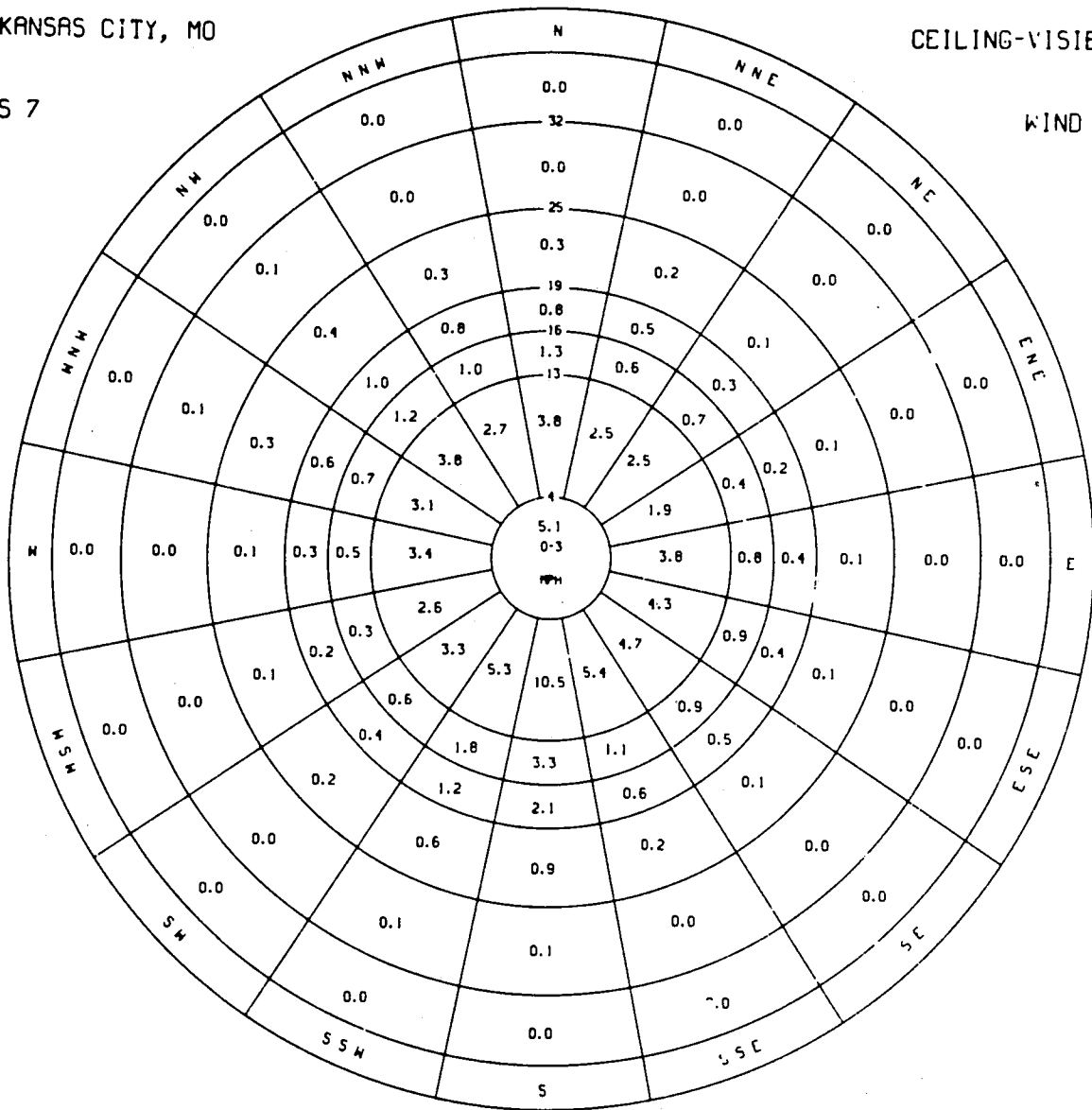
Note: Ceiling-visibility class 2 is the sum of classes 3-6.

MCI KANSAS CITY, MO

CLASS 7

CEILING-VISIBILITY

WIND GRAPH





KANSAS STATE BOARD OF AGRICULTURE

DIVISION OF WATER RESOURCES

GUY E. GIBSON, Chief Engineer—Director

109 SW Ninth Street

TOPEKA, KANSAS 66612-1283

(913) 296-3717

HARLAND E. PRIDDLE

Secretary

February 23, 1983

RECEIVED

FEB 28 1983

M. W. PELLEY

Mr. Glen Jenkins
Olin Water Services
9393 W. 10th Street
Overland Park, KS 66210

Re: Requested Water Right Data

Dear Mr. Jenkins:

In response to the telephone conversation you had with a member of our staff on February 18, 1983, please find tabulated below the information requested by you.

Vested Right, WY 002

one (1) well near the Southwest corner of Lot 4, more particularly described as being near a point 75 feet North and 2500 feet West of the Southeast corner of Section 27, Township 10 South, Range 25 East

Mutual of New York, 1740 Broadway, New York, NY 10019;

Vested Right, WY 006

seven (7) wells; four (4) in the Northeast Quarter of the Northwest Quarter (NE $\frac{1}{4}$ NW $\frac{1}{4}$), and three (3) in the Southwest Quarter of the Northeast Quarter (SW $\frac{1}{4}$ NE $\frac{1}{4}$) of Section 27 Township 10 South, Range 25 East

General Motors Corporation, B.O.P. Assembly Division, Fairfax District & Kindelberger Road, Kansas City, KS 66110;

Vested Right, WY 008

two (2) wells; one (1) in the Northeast Quarter of the Southwest Quarter of the Northeast Quarter (NE $\frac{1}{4}$ SW $\frac{1}{4}$ NE $\frac{1}{4}$), more particularly described as being near a point 3520 feet North and 1899 feet West of the Southeast corner, and one (1) in the Northeast Quarter of the Southwest Quarter of the Northeast Quarter (NE $\frac{1}{4}$ SW $\frac{1}{4}$ NE $\frac{1}{4}$), more particularly described as being near a point 3571 feet North and 1901 feet West of the Southeast corner, both in Section 34, Township 10 South, Range 25 East

Phillips Petroleum Company, Mr. W. E. Cannon, 6 D-4 Phillips Building, Bartlesville, OK 74004;

RECEIVED

FEB 25 1983

Mr. Glen Jenkins
February 23, 1983
Page 2

Vested Right, WY 009

three (3) wells; one (1) well in the Northwest Quarter of the Northwest Quarter of the Northwest Quarter (NW $\frac{1}{4}$ NW $\frac{1}{4}$ NW $\frac{1}{4}$), one (1) well near the center of the Northwest Quarter of the Northwest Quarter (NW $\frac{1}{4}$ NW $\frac{1}{4}$), and one (1) well in the Southeast Quarter of the Northeast Quarter of the Northwest Quarter (SE $\frac{1}{4}$ NE $\frac{1}{4}$ NW $\frac{1}{4}$), all in Section 35, Township 10 South, Range 25 East

Mr. Roger Crews, Comptroller, Fairfax Municipal Airport, 3301 Fairfax Road, Kansas City, KS 66104;

Vested Right, WY 010

seven (7) wells; one (1) well in the Northeast Quarter of the Southeast Quarter of the Northwest Quarter (NE $\frac{1}{4}$ SE $\frac{1}{4}$ NW $\frac{1}{4}$), one (1) well in the Southwest Quarter of the Southwest Quarter of the Southwest Quarter (SW $\frac{1}{4}$ SW $\frac{1}{4}$ SW $\frac{1}{4}$), one (1) well in the Northeast Quarter of the Southwest Quarter of the Southwest Quarter (NE $\frac{1}{4}$ SW $\frac{1}{4}$ SW $\frac{1}{4}$), one (1) well in the Southeast Quarter of the Northeast Quarter of the Northwest Quarter (SE $\frac{1}{4}$ NE $\frac{1}{4}$ NW $\frac{1}{4}$), one (1) well in the Southeast Quarter of the Northwest Quarter of the Southwest Quarter (SE $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$), one (1) well in the Northeast Quarter of the Southeast Quarter of the Northwest Quarter (NE $\frac{1}{4}$ SE $\frac{1}{4}$ NW $\frac{1}{4}$), and one (1) well in the Northeast Quarter of the Southwest Quarter of the Southwest Quarter (NE $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$), all in Section 35, Township 10 South, Range 25 East

Phillips Petroleum Company, Mr. W. E. Cannon, 6 D-4 Phillips Building, Bartlesville, OK 74004;

File No. 731

two (2) wells; one (1) well in the Northwest Quarter of the Northeast Quarter of the Southwest Quarter (NW $\frac{1}{4}$ NE $\frac{1}{4}$ SW $\frac{1}{4}$), and one (1) well in the Northeast Quarter of the Southeast Quarter of the Northwest Quarter (NE $\frac{1}{4}$ SE $\frac{1}{4}$ NW $\frac{1}{4}$), both in Section 35, Township 10 South, Range 25 East

Phillips Petroleum Company, Mr. W. E. Cannon, 6 D-4 Phillips Building, Bartlesville, OK 74004;

File No. 8814

four (4) wells; three (3) wells in the Northeast Quarter of the Southeast Quarter of the Southeast Quarter (NE $\frac{1}{4}$ SE $\frac{1}{4}$ SE $\frac{1}{4}$), and one (1) well in the Northwest Quarter of the Southeast Quarter of the Southeast Quarter (NW $\frac{1}{4}$ SE $\frac{1}{4}$ SE $\frac{1}{4}$), both in Section 28, Township 10 South, Range 25 East

Sunshine Biscuits, Incorporated, tenant for New York Life Insurance Co., 801 Sunshine Road, Kansas City, KS;

Mr. Glen Jenkins
February 23, 1983
Page 3

File No. 8830

seven (7) wells; two (2) wells in the Southeast Quarter of the Northeast Quarter of the Southwest Quarter ($SE\frac{1}{4} NE\frac{1}{4} SW\frac{1}{4}$), two (2) wells in the Northeast Quarter of the Northeast Quarter of the Southwest Quarter ($NE\frac{1}{4} NE\frac{1}{4} SW\frac{1}{4}$), one (1) well in the Northwest Quarter of the Northeast Quarter of the Southwest Quarter; one (1) well in the Northwest Quarter of the Northwest Quarter of the Southeast Quarter ($NW\frac{1}{4} NW\frac{1}{4} SE\frac{1}{4}$), and one (1) well in the Southwest Quarter of the Northeast Quarter of the Southwest Quarter ($SW\frac{1}{4} NE\frac{1}{4} SW\frac{1}{4}$), all in Section 27, Township 10 South, Range 25 East

Owens-Corning Fiberglas Corp., Fiberglas Tower, Toledo, Ohio 43659, Attention: H.O. Youngquist;

If we may be of further assistance to you, please feel free to contact us.

Very truly yours,

Paul C. Clark

Paul C. Clark
Hydrologist

PCC:GEE:ks

State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

~~XXXXXXXXXXXXXXXXXXXX~~

Barbara J. Sabol, Secretary

Forbes Field
Topeka, Kansas 66620
913-862-9360



February 22, 1983

Glen Jenkins
Olin Water Service
9393 West 110th Street
Overland Park, Kansas 66210

Request for Info File:
Wyandotte County SW/4,
Sec. 27, T20S, R25E

Dear Mr. Jenkins:

Pursuant to our telephone conversation February 18, 1983 our files indicate that there are 25 water wells located within a mile radius of your facility. Please remember our records only go back to January 1, 1975.

I recommend you contact Paul Clark, Division of Water Resources (913-296-3717) and inquire with him about water wells they may have records on since they are responsible for appropriation of surface and ground water uses.

Two other agencies may be of help to locate water wells and they are the Kansas Geological Survey (Manoutch Heidari of 913-864-5672) and the United States Geological Survey (913-864-4321) both located in Lawrence, Kansas.

If it is your aim to supply the location of all water wells to the USEPA, it will probably be advantageous to physically inspect the 1 mile radius area.

The fee for copying the 25 well records is \$0.25 each and we will send you these copies as soon as we receive your check or money order made out for \$6.25 payable to the Kansas Department of Health and Environment.

Please contact me if I can be of further assistance.

Sincerely yours,

DIVISION OF ENVIRONMENT

Dwight W. Brinkley
Environmental Geologist
Environmental Geology Section

DWB:cavs
cc: Larry Knoche
Mary Pinkerton

RECEIVED
FEB 28 1983

122.25(b)(1): For facilities that store containers of hazardous waste, except as otherwise provided in Section 264.170.

- (i) A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

NOTE: See attached design drawings.

(A) Basic design parameters, dimensions, and materials of construction.

- The proposed storage facility is designed to physically and structurally hold an area four pallets wide by five pallets deep (pallets are four feet by four feet). The pallets may be stacked to four layers.
- The overall dimensions of the facility will be 28 feet by 22.5 feet and the area available for storage will be 21 feet by 20 feet.
- The slab trench and sump will be constructed of concrete reinforced with carbon steel wire mesh. The trench and sump cover will be a carbon steel grate. The access ramp will be asphalt.

(B) How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system.

The design promotes drainage by sloping the concrete slab away from the access ramp and to the trench and sump. Containers will be protected from standing liquid by the large volume of trench and sump containment available and by being on pallets.

(C) Capacity of the containment system relative to the number and volume of containers to be stored.

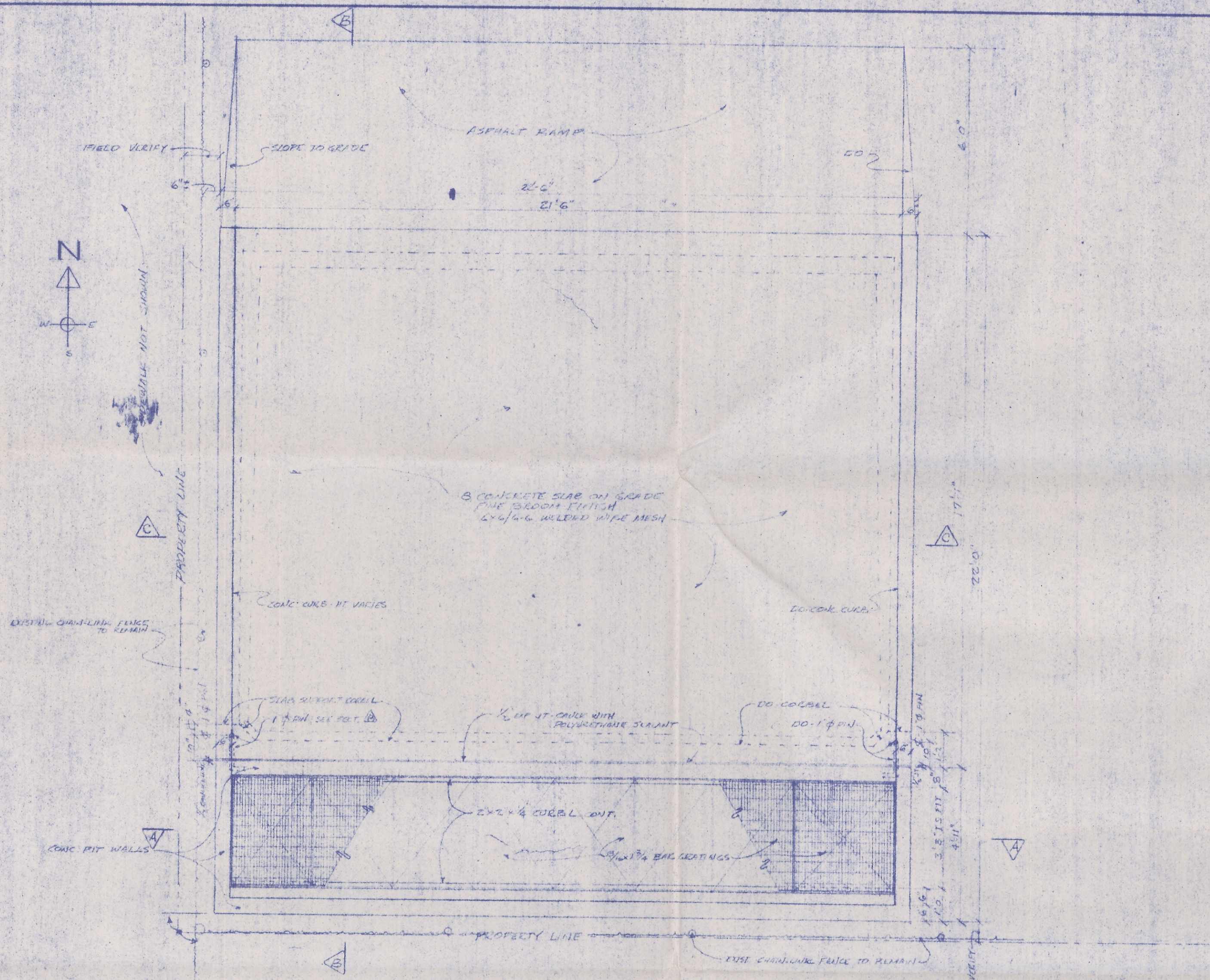
The capacity of the storage facility is for 17,600 gallons of free liquid. The actual capacity of the containment system is for approximately 4,500 gallons of free liquid, or approximately 26 percent of the storage facility capacity. This containment system capacity is sufficient to provide for collection of 10 percent of the storage facility's free liquid capacity in addition to the run-off from a nine inch rain.

(D) Provisions for preventing or managing run-on.

Run-on is prevented by a nine inch curb on three sides and an access ramp up to nine inches on the fourth side of the facility.

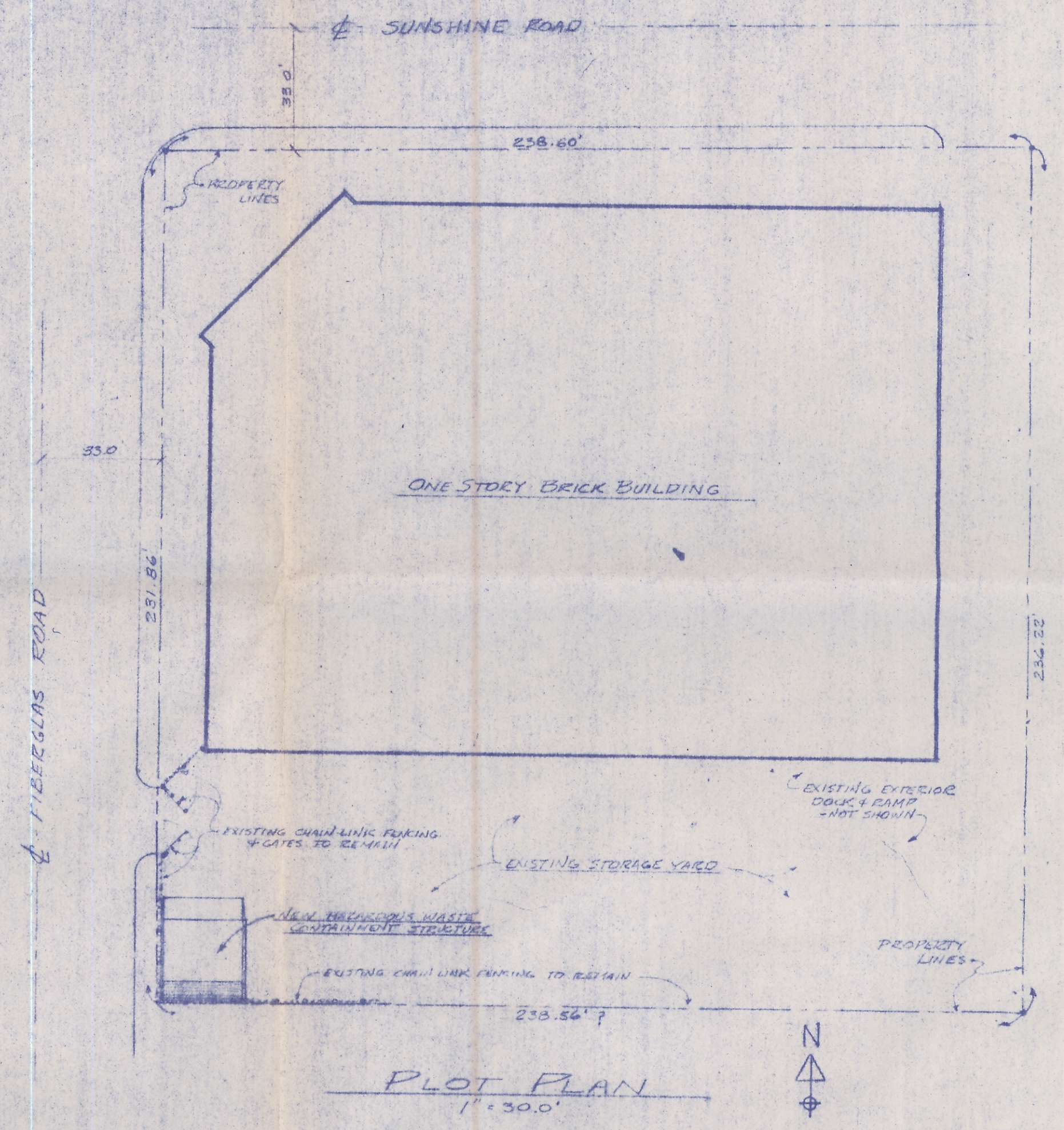
- (E) How accumulated liquids can be analyzed and removed to prevent overflow.

The interior slab of the facility is sloped to a trench and sump for storage. Accumulated liquids will be sampled, analyzed, and removed with a portable sump pump. If analysis indicates that the liquid exhibits hazardous waste characteristics or that the liquid does not meet sewer discharge parameters, the waste will be placed into a suitable container or containers and stored in the facility prior to shipment to a permitted and approved off-site treatment facility.

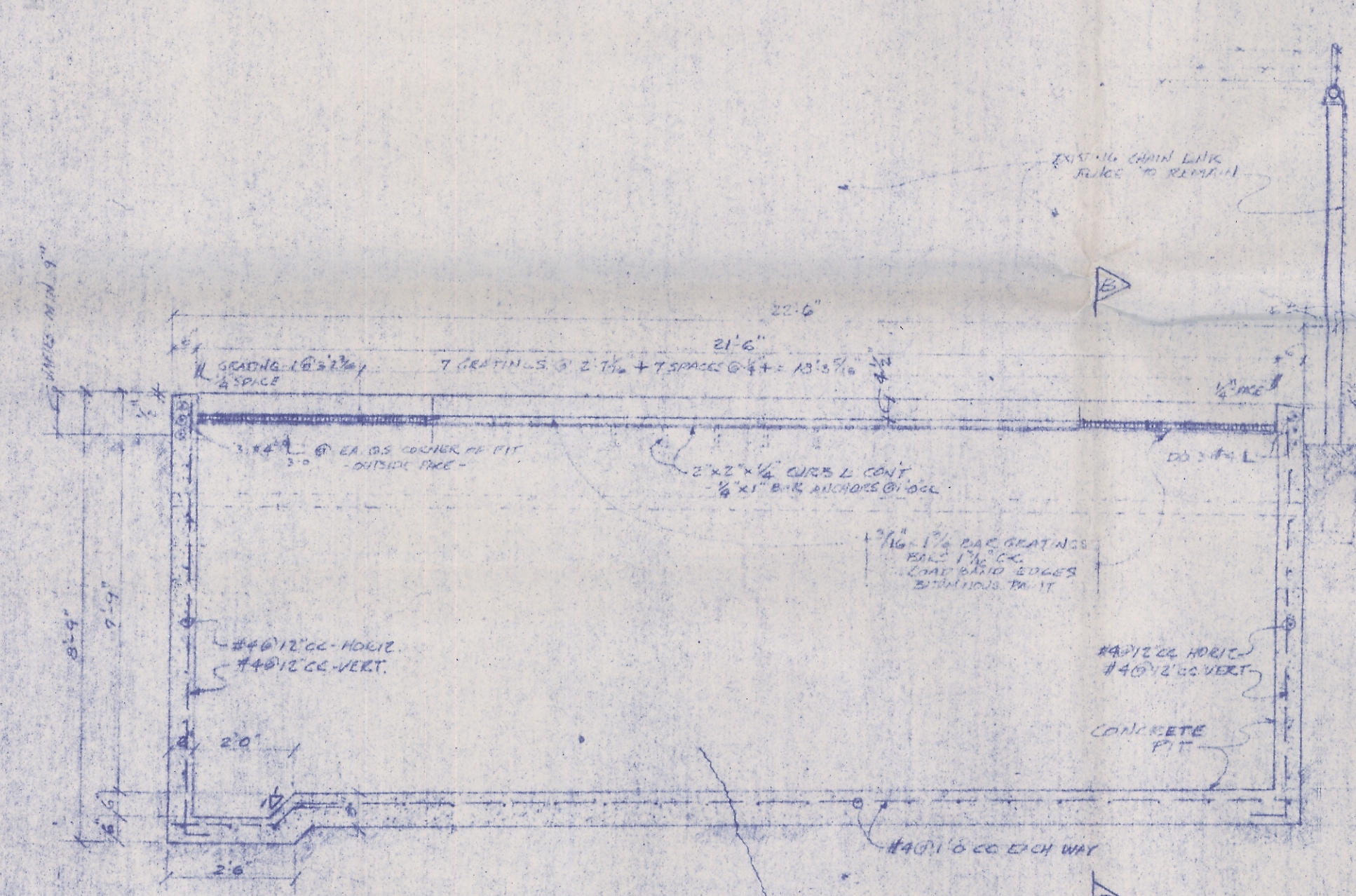


PLAN VIEW - CONTAINMENT STRUCTURE
3/8" = 1'-0"

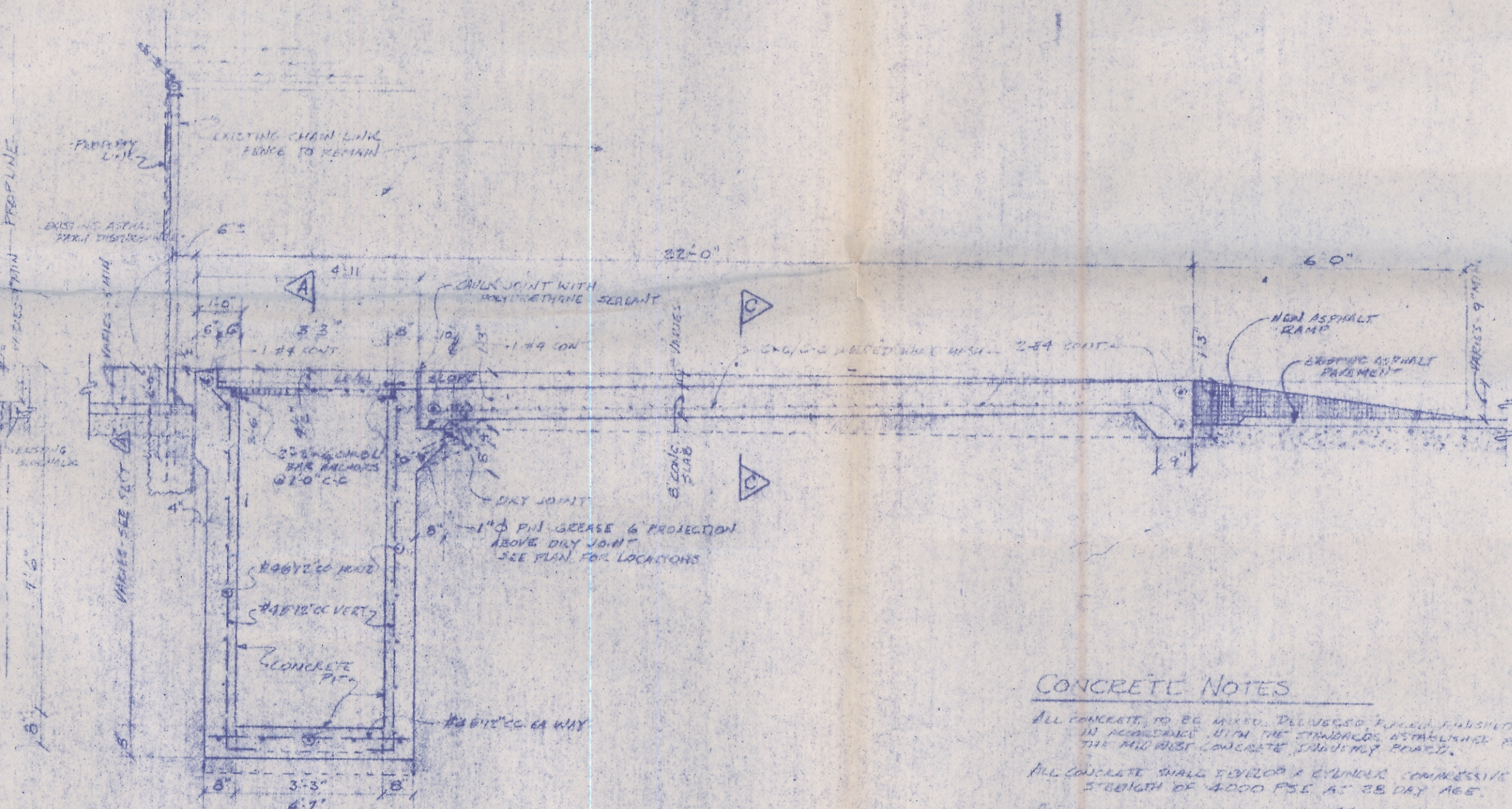
| CONTAINMENT VOLUME SUMMARY | |
|--|----------------|
| MAXIMUM QUANTITY OF HAZARDOUS MATERIALS TO BE STORED - | 17,000 GALLONS |
| CONTAINMENT VOLUME REQUIRED | |
| SPILLED LIQUID HAZARDOUS MATERIAL - 10% X 17,000 GALLONS = | 1,700 GALLONS |
| PALLET DISPLACEMENT ALLOWANCE | 10" |
| RAINFALL ALLOWANCE - 9" X 21'6" X 21'6" = | 347" |
| TOTAL CONTAINMENT VOLUME REQUIRED | 592 GALLONS |
| ACTUAL VOLUME CAPACITY OF CONTAINMENT STRUCTURE | 611 GALLONS |



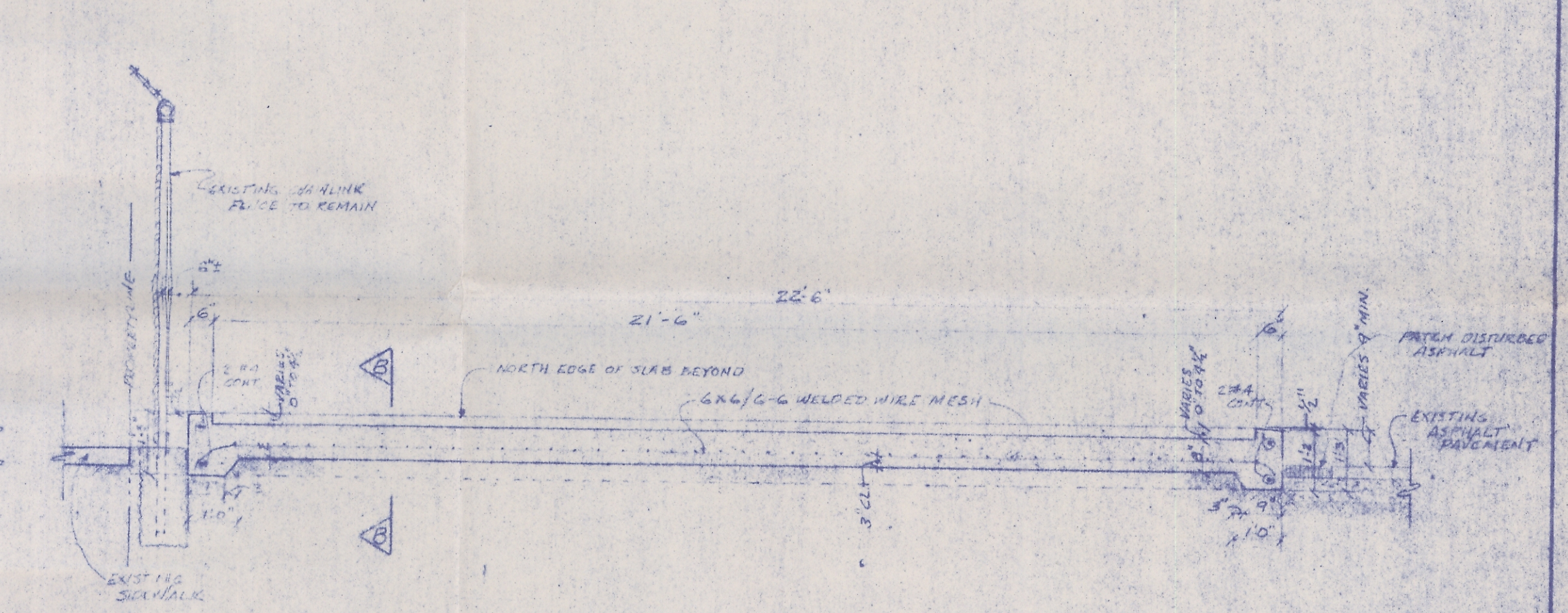
PLOT PLAN
1" = 30.0'



SECTION A-A
3/8" = 1'-0"



SECTION B-B
3/8" = 1'-0"



SECTION C-C
3/8" = 1'-0"

CONCRETE NOTES

- ALL CONCRETE TO BE WHITE. ALL USED FILLING & CRACKS TO BE REPAIRED WITH THE SAME MIXTURE AS THE ORIGINAL CONCRETE. PATCHES TO BE MATCHED.
- ALL CONCRETE SHALL BE TESTED FOR COMPRESSIVE STRENGTH BY THE METHOD OF 1500 PSI. AT 28 DAYS.
- ALL CONCRETE SHALL BE TESTED FOR CURING TIME BY THE METHOD OF 1500 PSI. AT 28 DAYS.
- ALL CONCRETE SHALL BE TESTED FOR CURING TIME BY THE METHOD OF 1500 PSI. AT 28 DAYS.
- ALL CONCRETE SHALL BE TESTED FOR CURING TIME BY THE METHOD OF 1500 PSI. AT 28 DAYS.

| | |
|---|--------------------------|
| OLIN WATER SERVICES DIVISION OF OLIN CORPORATION | |
| SCALE: AS INDIC. | APPROVED BY: |
| DATE: 2/10/93 | DRAWN BY: RTS |
| K.C. HAZARDOUS WASTE CONTAINMENT STRUCTURE 3155 FIBERGLAS ROAD - KANSAS CITY, KANSAS | |
| PLANS & SECTIONS | DRAWING NUMBER 1 OF 1 |

122.25(b)(1)(ii) Sketches, drawings, or data demonstrating compliance with Section 264.176 (location or buffer zone and containers holding ignitable or reactive wastes) and Section 264.177(c) (location of incompatible wastes), where applicable.

As indicated in the earlier response to 122.25(a)(2) concerning chemical and physical analyses of hazardous wastes to be handled, certain ignitable or ignitable/reactive wastes may at times be placed into storage in the proposed drum storage facility. However, for reasons that have already been accepted by the Kansas Department of Health and Environment as a sound basis for granting an exemption from 40 CFR 265.176 for the existing hazardous waste storage facility, it is believed that a waiver of 40 CFR 264.176 is appropriate for the proposed hazardous waste storage facility. These reasons were stated in the attached October 27, 1981 correspondence from Mr. Wilbur Bradley of Olin Water Services to Mr. Randy Bradley of the Kansas Department of Health and Environment. The exemption from 40 CFR 265.176 was granted by way of the attached letter dated September 24, 1982 from Vivek Kamath of the Kansas Department of Health and Environment to Mr. Wilbur Bradley. The attached January 6, 1983 letter from Mr. Robert Morby of EPA Region VII to Mr. Mark Pelley of Olin Corporation indicates that EPA will in the course of its evaluation of the Part B permit application consider arguments for relief from 40 CFR 264.176 and that such arguments should address alternatives that could meet the intent of the regulation, problems with meeting the buffer zone requirement, and local fire code requirements. The following discussion addresses these areas of concern.

I. Alternatives that could meet the intent of the buffer zone requirement.

As indicated in the materials provided pursuant to 122.25(b)(1)(i), preceding, the proposed container storage facility is designed to ensure containment of any foreseeable release of hazardous waste. Locating the proposed facility in the same southwest corner that the existing facility is located in would insure that there would be a distance of approximately 68 feet to the nearest building to the south and a distance of over 78 feet to the nearest building to the west. Weekly inspections of the drum storage area would detect potential problems relating to container integrity before emergency conditions could develop.

II. Problems with meeting the buffer zone requirement:

In order to provide for adequate aisle space between drums in the storage facility, any practical design would have to specify an area measuring at least twenty feet on each side. If such an area were dedicated for waste storage inside the manufacturing building, it would result in potentially unsafe crowding of the workplace and reduced aisle space available to emergency response personnel and equipment in the event of an emergency. If such an area were dedicated for waste storage inside the warehouse building to the east of the manufacturing building, it would likewise create crowding.

Furthermore, it is not clear that Olin could secure permission to store hazardous waste in the warehouse which is owned by another party. If drummed waste were moved as far as possible from the property line without being relocated to within the production or warehouse buildings and without being placed on a parking lot or truck loading/unloading zone, then it would have to be placed up against the exterior south wall of the production building. That wall stands only 68.3 feet from the south property line, so a waste storage area measuring at least twenty feet on a side would still not provide for the 50 foot buffer zone. Furthermore, such an arrangement would create problems with regard to the plant's fire insurance policy.

III. Local fire code requirements

The applicable local fire code is the 1981 National Fire Protection Association's Flammable and Combustible Liquids Code (NFPA 30 - 1981). The facility is designed to comply with this code and will be evaluated against this code during the local building permit process.



51 CORPORATE WOODS, 9393 WEST 110TH STREET, OVERLAND PARK, KANSAS 66210 (913) 642-7100

October 27, 1981

Mr. Randy D. Bradley, Div. of Environment
Hazardous Waste Management Section
Bureau of Environmental Sanitation
Topeka, Kansas

Dear Mr. Bradley,

In response to your letter dated 9/11/81, listing (4) items identified by the U.S. E.P.A. that needed to be corrected to bring us in compliance with RCRA Regulations, the following action has been taken.

1. An inspection schedule consistent with the requirements of Sections 265.15 and 265.174 of the RCRA regulations has been prepared and is available for review, an inspection log has also been prepared.
2. Pursuant to Section 260.20 at the RCRA regulations, we would like to petition for a modification of the requirement in Section 265.176 that containers holding ignitable or reactive waste must be located at least 50 feet from the property line of our plant. We think such a modification would be appropriate at our plant for the following reasons:
 - (a) Storage of our containers of ignitable or reactive hazardous waste at least 50 feet from the property line would require that they be inside the production building; this would result in potentially unsafe crowding of the workplace and reduced aisle space available to emergency response personnel and equipment in the event of an emergency.
 - (b) Routine inspections of the drum storage area would detect potential problems before the onset of emergency conditions.
 - (c) The storage of ignitable or reactive drummed waste near the plant property line is no more dangerous than the storage of ignitable or reactive drummed raw or finished goods near the plant property line.
 - (d) If the drummed waste ignitables were moved as far as possible from the property line without being relocated to within the production building, they would still not be 50 feet from the property line, and they would be placed up against the exterior wall of the production building in violation of our property insurance policy.

Page 2
Mr. Randy D. Bradley
October 27, 1981

- (e) If drummed waste ignitables had to be stored inside the production building, then other raw materials or finished goods would be displaced to the outside area; such an arrangement would involve substantial operating inefficiency without any clear gain in waste management safety.
- 3. Aisle space as required in Section 265.35 has been provided.
- 4. A contingency plan based on Sections 265.51 - 265.54 has been prepared and is available for review, the local fire department has expressly stated that it does not want a copy of any plant's contingency plan as it would be likely to delay and confuse the response to an emergency.

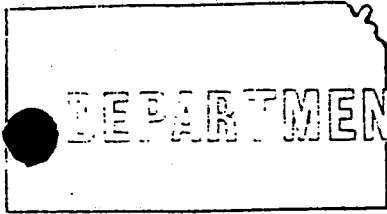
Sincerely,



W. W. Bradley
Plant Manager
Olin Water Services

WWB:je

cc: B. Davidoff
H. Day
R. S. Hendey
B. M. Madsen
J. Sandoval
M. W. Pelley
H. Rubenstein
W. Dame



State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Joseph F. Harkins, Secretary

Forbes Field
Topeka, Kansas 66620
913-862-9360



September 24, 1982

Mr. W. W. Bradley
Olin Water Services
3155 Fiberglass Road
Kansas City, Kansas 66115

Re: Variance Request No. 82-05

Dear Mr. Bradley:

We have reviewed your letter dated August 31, 1982 and the variance request enclosed with it. Considering the circumstances for which you requested the variance, we are exempting you from 40 CFR 265.176 under the authority received by the State of Kansas for administering the hazardous waste management program for Interim Status facilities. This approval is valid until September 30, 1983, at which time we will review the variance to determine if an extension is necessary.

Please note that this approval will exempt you from storage of containers holding ignitable or reactive wastes within at least 15 meters (50 feet) from your property line.

If you have any questions, please feel free to call me.

Sincerely yours,

DIVISION OF ENVIRONMENT

Vivek Kamath

Vivek Kamath
Hazardous Waste Management Section
Bureau of Environmental Sanitation

VK:cavs
cc: Randy Bradley

RECEIVED
OCT 04 1982
B. M. MADSEN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

JAN 06 1983

Mr. Mark Pelley
Olin Corporation
Environmental Affairs Department, 3-F
120 Long Ridge Road
Stamford, Connecticut 06904

EPA I.D. NO.: KSD000203638

Dear Mr. Pelley:

This letter confirms the December 30, 1982, telephone conversation with Karen Flournoy of my staff, and yourself regarding the Olin Water Services facility in Kansas City, Kansas.

We have researched your December 28, 1982, inquiry regarding the Kansas Department of Health and Environment (KDHE) variance from the 40 CFR 265.176 requirement for ignitable waste in containers and the Part B permit application. As Mrs. Flournoy advised you on December 30, we request that the Part B application include a discussion of why the requirement of 265.176 cannot be met and propose alternatives to meet the intent of this regulation. We will review this information during the application review process and determine if we can grant a waiver. It is important that we develop written documentation/justification on this issue. You should also discuss local fire codes with regard to storage of ignitable waste in containers. Any further questions on this issue or the Part B application process can be directed to Mrs. Flournoy at (816) 374-6531.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Robert L. Morby".

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: John Goetz, KDHE

RECEIVED

JAN 10 1983

M. W. PELLEY

122.25(b)(1)(iii): Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with Sections 264.177 (a) and (b), and 264.17 (b) and (c).

I. Sections 264.177 (a) and (b): Incompatible wastes, or incompatible wastes and materials, will never be placed into the same container. Each container will be dedicated to a single waste. In addition, containers will not, under any foreseeable circumstances, be reused for waste storage; if ever a container were to be so reused, it would be triple rinsed with a suitable solvent prior to being loaded with any waste not compatible with the prior contents. Likewise, containers will be appropriately triple rinsed prior to initial service for hazardous waste storage if incompatibility of residue is of concern.

II. Sections 264.17 (b) and (c): See Section 122.25(a)(9).